

MODERN DAY SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Purpose

To set out the Company policy on Modern Day Slavery and Human Trafficking in the workplace and ensure the communication of this policy to all colleagues within the company.

Policy

- The Company acknowledges the provisions of the Modern Slavery Act 2015 and will ensure transparency within its organisation and with suppliers of goods and services to the organisation.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world. They are a violation of fundamental human rights.

The Company will not tolerate or condone slavery or human trafficking in any part of our organisation. We have a zero tolerance approach to modern slavery and human trafficking and are totally committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, colleagues and all other business partners to commit to the same.

- Imported goods from sources outside the UK and EU are potentially more at risk of slavery and human trafficking issues therefore the level of management control required for these sources should be continually monitored
- The Company will not knowingly support or deal with any business involved in slavery or human trafficking.
- The Directors and Senior Management team of the Company have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity.

- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- The Company is satisfied from its own due diligence that there is no evidence of any act of modern day slavery or human trafficking within its own organisation. As part of the Company's due diligence processes into modern slavery and human trafficking the supplier approval procedure incorporates a review of the controls undertaken by them. The Company also conducts premises visits as deemed necessary to overseas suppliers to ensure due diligence is observed.

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Our Policy Statement is available to all colleagues and all colleagues are expected to read and understand it. This policy must be clearly and prominently displayed on the Notice Board at all business locations.

- All persons working for us in any capacity must:
 - Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy.
 - Notify their immediate Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. We have systems in place for individuals to report concerns, anonymously if preferred, and to protect whistleblowers.
- The Company will review both its supply chain and internal operations on an annual basis to check compliance with the above policy, and to ensure that our policy is being implemented effectively.

The Directors and Senior Management team will review the Company's statement in response to any major business, organisational or legislative changes or as a result of any breach or concern regarding modern slavery.

Approved by Steve Westbrook - Chief Executive

Effective: March 2020