



## **Modern Slavery Policy**

### **1. Overview and How we define Modern Slavery**

- 1.1. Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.
- 1.2. We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.
- 1.3. You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- 1.4. Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 1.5. Our Anti-Slavery Officer ('ASO') is Alex Keen. They are responsible for this policy.
- 1.6. If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

### **2. Preventing Modern Slavery in our business**

- 2.1. We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.
- 2.2. We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

### **3. If you are one of our Suppliers**

- 3.1. If you supply us with goods or services, you must assess your business and supply chains and confirm to our ASO that you:
  - comply with your legal obligations, in relation to Modern Slavery; and
  - are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.

You must also provide a copy of your anti-slavery policy.



3.2. If you breach this policy or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

**4. If you are an Employee or a Worker providing services for us**

4.1. You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO. Our ASO will investigate and report to our Board of Directors within a reasonable time, on actions which may require to be taken.

4.2. You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our ASO and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

*TOwen*  
Tom Owen  
Managing Director

Last Review Date – January 2024