

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

### **Policy statement**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. We have a zero tolerance approach to modern slavery and are committed to acting ethically and with integrity and transparency in all of our business dealings and relationships and attempt to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same from all of our suppliers, contractors and other business and expect that our suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point something becomes an instance of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, we accept that we have a responsibility through our due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

### **Compliance**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains, whether in the UK or abroad, is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of our supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

**Breach of the policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

We may terminate our commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.