



Modern Slavery & Human Trafficking Policy

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MODERN SLAVERY & HUMAN TRAFFICKING POLICY

1. **PURPOSE AND COMMITMENT**

The Company is committed to preventing, identifying, mitigating and remediating modern slavery, human trafficking, forced labour and other forms of exploitation within its own operations and throughout its supply chains.

The Company has zero tolerance for modern slavery and human trafficking and will take proportionate and risk-based steps to identify and address actual and potential risks to workers.

The Company recognises its responsibilities under the Modern Slavery Act 2015 and other applicable UK legislation and guidance.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking.

2. **SCOPE**

This Policy applies to all employees, workers, agency workers, contractors, consultants, temporary workers, directors and other individuals working on behalf of the Company.

It also applies to the Company's suppliers, subcontractors, labour providers, recruitment agencies, agents, intermediaries, business partners and other relevant supply-chain relationships.

The Company expects its suppliers and business partners to apply equivalent standards throughout their own supply chains and to cooperate with the Company's due diligence and monitoring requirements.

3. **OUR STANDARDS**

- The Company will take reasonable and proportionate steps to ensure that:
- no person is subjected to slavery, servitude, forced or compulsory labour or human trafficking;
- workers are free to leave their employment in accordance with applicable law and their contractual terms;
- workers are not subjected to threats, violence, harassment, intimidation or coercion;
- workers are not required to work compulsory overtime;
- workers receive lawful and transparent pay and are not subject to unlawful withholding or deductions;
- workers are not charged recruitment or employment-placement fees as a condition of obtaining work;
- original identity documents are not confiscated or improperly retained;
- workers have appropriate freedom of movement;
- workers have access to appropriate grievance and reporting mechanisms;
- workers are informed of their employment rights and conditions in a form and language they can understand;
- child labour is prohibited and any safeguarding concerns involving children are escalated appropriately;
- discrimination and victimisation are not tolerated; and

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- workers are able to raise concerns without fear of retaliation.

4. RISK ASSESSMENT

The Company will maintain a proportionate and risk-based approach to identifying modern slavery risks.

Risk assessments will consider, where relevant:

- the nature of the Company's products and services;
- sectors and industries in which suppliers operate;
- countries and regions in which activities take place;
- the use of migrant, temporary, agency or vulnerable workers;
- recruitment practices and recruitment agencies;
- the use of subcontractors and labour providers;
- the number and complexity of supply-chain tiers;
- the nature of the goods, services or labour being supplied;
- known modern slavery or labour exploitation risks;
- relevant audit, inspection, grievance and whistleblowing information;
- purchasing practices that may place inappropriate pressure on suppliers or workers; and
- any other relevant information indicating an increased risk to workers.

Risk assessments will focus on risks to people and workers rather than solely on financial or reputational risk to the Company.

5. SUPPLIER DUE DILIGENCE

Modern slavery considerations will form part of the Company's supplier approval and ongoing supplier-management processes.

Depending on the level of risk, the Company may:

- undertake supplier questionnaires and due diligence checks;
- review supplier modern slavery statements and relevant policies;
- assess recruitment and labour-provider arrangements;
- require evidence of responsible recruitment practices;
- require contractual modern slavery and human-rights obligations;
- require suppliers to flow relevant requirements down to subcontractors and other supply-chain partners;
- undertake audits, inspections or other assessments;
- engage directly with workers or worker representatives;
- require corrective action plans;
- monitor implementation of corrective actions; and
- undertake further supply-chain mapping where appropriate.

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Due diligence will be proportionate to the size, nature and risk of the relevant supplier or business relationship.

The Company will not rely solely on supplier questionnaires or audits and will, where appropriate, use worker feedback, grievance mechanisms and other sources of information to identify potential risks.

6. RECRUITMENT AND LABOUR PROVIDERS

The Company expects recruitment agencies, labour providers and other intermediaries to operate responsibly and lawfully.

The Company will not knowingly engage labour providers or recruitment agencies that charge workers unlawful recruitment fees or otherwise use recruitment practices that create a risk of forced labour, debt bondage or exploitation.

Where appropriate, the Company will require suppliers and labour providers to confirm that:

- workers have not paid recruitment fees to obtain employment;
- workers' identity documents are not improperly retained;
- workers receive clear information about their employment terms;
- workers are paid lawfully and on time; and
- workers have access to an effective grievance or reporting mechanism.

7. REPORTING CONCERNS

Anyone who has a concern regarding modern slavery, human trafficking, forced labour or worker exploitation should report it as soon as reasonably practicable.

Concerns may be raised through:

- the Company's Whistleblowing Policy and internal reporting channels;
- HR or an appropriate manager;
- [insert internal confidential reporting contact/channel]; or
- the Modern Slavery Helpline on **08000 121 700**.

In an emergency or where a person is in immediate danger, the police should be contacted by calling **999**.

The Company will not tolerate retaliation, victimisation or detriment against any person who raises a genuine concern or makes a protected disclosure.

Reports will be handled sensitively and confidentially as far as reasonably practicable and lawful.

Where a potential victim is identified, the Company will follow applicable safeguarding and reporting requirements and, where appropriate, support referral to the relevant authorities or the National Referral Mechanism through an authorised first responder.

8. INVESTIGATION AND REMEDISTION

All concerns will be taken seriously and assessed promptly.

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Where modern slavery or exploitation is suspected or identified, the Company will prioritise the safety and wellbeing of affected workers.

Depending on the circumstances, the Company's response may include:

- immediate safeguarding measures;
- investigation and fact-finding;
- engagement with the affected worker or workers;
- engagement with suppliers, labour providers or other relevant parties;
- corrective and preventative action;
- repayment or other appropriate remediation where workers have suffered financial loss or other harm;
- access to appropriate support or specialist organisations;
- reporting to relevant authorities;
- enhanced monitoring; and
- responsible disengagement from a supplier or business relationship where appropriate.

The Company will not automatically terminate a supplier relationship solely because a modern slavery concern has been identified. The Company will consider whether remediation and effective corrective action are possible and whether termination could increase risks to affected workers.

Where serious exploitation is confirmed, mitigation or remediation is not possible, or a supplier refuses to cooperate, the Company may suspend or terminate the relevant business relationship in accordance with the applicable contract and law.

9. EMPLOYEE CONDUCT AND DISCIPLINARY ACTION

Employees and workers must comply with this Policy and must not engage in, facilitate, conceal or knowingly ignore modern slavery, human trafficking or other serious exploitation.

A breach of this Policy may result in disciplinary action, up to and including dismissal where appropriate.

Any disciplinary action will be undertaken in accordance with the Company's disciplinary procedure and applicable employment law, including appropriate investigation, a fair process and the employee's right to respond to allegations.

No person will be disciplined or otherwise disadvantaged merely for raising a genuine concern in accordance with this Policy.

10. TRAINING AND AWARENESS

The Company will provide appropriate modern slavery awareness and training based on the risks associated with its operations and supply chains.

Training will be provided to relevant employees and will be appropriately tailored for roles including:

- HR and recruitment;
- Procurement and purchasing;

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- senior management and directors;
- managers and frontline staff;
- contract and supplier managers; and
- other employees or workers whose roles expose them to increased modern slavery risk.

Relevant training will include how to identify indicators of modern slavery, how to respond to concerns, reporting routes, safeguarding considerations and the Company's approach to remediation.

11. MONITORING AND EFFECTIVENESS

The Company will monitor the effectiveness of its modern slavery controls through proportionate measures including, where appropriate:

- supplier risk assessments;
- supplier audits and evaluations;
- training completion;
- worker feedback and engagement;
- whistleblowing and grievance data;
- corrective action plans;
- incident reporting;
- remediation outcomes; and
- other relevant key performance indicators.

The Company will use the findings from monitoring and evaluation to improve its policies, procedures, training and supply-chain controls.

The absence of reported incidents will not, by itself, be regarded as evidence that modern slavery risks do not exist.

12. ANNUAL MODERN SLAVERY STATEMENT

Where the Company is required to do so under section 54 of the Modern Slavery Act 2015, it will prepare and publish an annual Modern Slavery Statement setting out the steps taken during the relevant financial year to prevent modern slavery and human trafficking in its own business and supply chains.

The annual statement will be subject to the required senior management/Board approval and director or other appropriate sign-off and will be published in accordance with applicable legal requirements and Government guidance.

The Company may also voluntarily publish a Modern Slavery Statement where it is not legally required to do so.

13. GOVERNANCE AND RESPONSIBILITIES

Overall responsibility for this Policy rests with the Board and senior management.

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Relevant functions, including HR, Procurement, Compliance, Legal, Operations and supplier/contract managers, are responsible for implementing the controls relevant to their areas of responsibility.

Managers are responsible for ensuring that employees and workers understand the requirements of this Policy and know how to report concerns.

The Company will provide appropriate resources, training and support to implement this Policy effectively.

14. POLICY REVIEW

This Policy will be reviewed at least annually and sooner where appropriate, including following:

- changes in legislation or Government guidance;
- significant changes to the Company's operations or supply chains;
- material changes to the Company's risk profile;
- a significant modern slavery incident;
- relevant audit or investigation findings; or
- changes to associated policies or procedures.

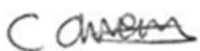
The Policy will be communicated to relevant employees, workers and business partners and will be made available in an appropriate and accessible format.

15. ALLEGATIONS AGAINST STAFF

This Policy should be read alongside the Company's:

- Whistleblowing Policy;
- Equality, Diversity and Inclusion Policy;
- Safeguarding Policy, where applicable;
- Supplier/Procurement Policy;
- Code of Conduct;
- Disciplinary and Grievance Procedures;
- Health and Safety Policy; and
- other relevant policies within the Company's Integrated Management System.

Unless expressly stated otherwise, this Policy does not form part of any individual's contract of employment or other contract and may be amended by the Company from time to time.



C Owens
Group CEO
Date: 22/09/2026

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