

MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded, and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty to exploit them for personal or commercial gain.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, business partners and our supply chain.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

Our Supply Chain

As part of our due diligence procedure, prior to approving a new supplier or sub-contractor we will review the controls which they undertake to eliminate modern slavery and human trafficking, particularly in regard to goods imported from outside the UK and EU which are potentially more at risk of involving slavery and human trafficking.

Responsibility

Our board of directors have been briefed on this subject and take responsibility for implementing this policy. The CEO who has signed the statement is also on the board who provided approval for the statement.

Our line managers at all levels are responsible for ensuring that all those who report to them understand and comply with this policy.

Staff at all levels are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the compliance team for review.

Compliance

This policy must be made available to all staff.

All staff must avoid any breaches of this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.

All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.

Staff are reminded that there are systems in place to encourage the reporting of concerns and to protect whistle blowers.

Communication

Our zero-tolerance approach to modern slavery will be clearly communicated to all suppliers, contractors and business partners when we commence a business relationship with them and reinforced in our subsequent communications with them.

As our organisation does not have a global turnover of £36 million or more, we are not required to produce a public slavery and human trafficking statement.

Breaches of Policy

1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
2. We will terminate relationships with suppliers, individuals or business partners working on our behalf if this policy is breached.



KATE MOREMENT
HEAD OF RISK AND COMPLIANCE

THIS POLICY WILL BE REVIEWED IN 2026