

# Modern Slavery & Human Trafficking Policy

## 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 in order to exploit them for personal or commercial gain.

1. The Company is committed to ensuring that there is no modern slavery or human trafficking in any part of our business.
2. We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.
3. We are committed to ethical principles, and require all employees to comply with the employment legislation and supply chain management legislation in the countries within which we operate.

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

## Supply Chain Management

We will not support or deal with any business which is known to be involved in slavery or human trafficking and expect all those in our supply chain and contractors to comply with our values.

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, interns, business partners and our supply chain.

## Responsibility

1. Our Senior Management have been briefed on this subject and take responsibility for implementing this policy.
2. Our line managers at all levels are responsible for ensuring that all those who report to them understand and comply with this policy.
3. 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 Senior Management via the Company suggestion box.

## Compliance

1. All staff must read, understand and comply with this policy.
2. 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.

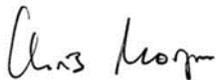
3. All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.
4. Staff are reminded that there are systems in place to encourage the reporting of concerns and to protect whistle blowers.

#### **Communication**

1. We will ensure all staff are aware of the risks of modern slavery and human trafficking and communicate additional information that supports this as appropriate.
2. Our annual Slavery and Human Trafficking Statement will provide information to supplement this policy, setting out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business. Our annual statement will include details of our activities, supply chains and actions being taken to ensure that Modern Slavery is not deliberately or inadvertently supported by us.

#### **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.



Chris Morgan  
Managing Director

22/11/18