



## Modern Slavery Policy Modern Slavery Policy

### 1. What is modern slavery?

1. Modern slavery is a crime and a fundamental breach of human rights.
2. Modern slavery includes slavery (asserting ownership over a person, depriving them of their freedom), servitude (providing services under coercion including living in a person's property and the victim being unable to change their position), forced labour (working under the threat of a penalty non-voluntarily) and human trafficking (arranging the travel of another person with a view to them being exploited). Put simply, it is the deprivation of a person's liberty by another, in order to exploit that person for personal or commercial gain.
3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
4. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. Our approach

- 2.0. We take a zero-tolerance approach to modern slavery in all its forms. We are committed to acting ethically and with integrity in all of our business dealings and relationships, ensuring no form of modern slavery is allowed to occur anywhere in our own business or in any of our supply chains.
  - 2.1. We encourage transparency in our business practices and in our supply chains. We never knowingly deal with any business – either as part of our supply chain or by being part of that business' supply chain – who is involved in modern slavery in any form, or supports or otherwise turns a blind eye to modern slavery, and expect the businesses in our supply chain to act with the same ethical standards and integrity.
  - 2.2. Prior to entering into arrangements with a supplier we consider carefully whether there is any risk that it might be engaging or otherwise involved in any form of modern slavery, and what steps it takes to mitigate the effects of modern slavery in its business.
  - 2.3. It is our policy to promote ethical working. In each case where we have a written contract with a business in our supply chain we will consider whether it is necessary to impose strict contractual conditions relating to ethical wording into such contract, and will add those if appropriate. In particular, we consider it implied into all of our dealings that our supply chain



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does not use forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

- 2.4. We require all of our suppliers in our supply chain to hold their own suppliers to the high standards as set out in this policy.
- 2.5. We aim to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and partner at the outset of our business relationship, and thereafter as appropriate.
- 2.6. We are committed to improving our practice to combat modern slavery and welcome any suggestions of ways in which we could do so.

### 3. Detection of modern slavery

- 3.0. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all of those working for us or otherwise under our contract. All members of staff are required to avoid any activity which might lead to, or suggest, a breach of this policy.
- 3.1. All members of staff have an obligation to ensure that any instance of modern slavery, or any suspicion of acts in contravention of this policy are brought to the attention of the Technical Director immediately.
- 3.2. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our business or within any of our supply chains constitutes any form of modern slavery, you should speak with the Technical Director.
- 3.3. 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 as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. That said, if concerns are raised and found to be malicious, that will be treated as an act of misconduct for which disciplinary action will follow.
- 3.4. The Technical Director has day-to-day responsibility for informing staff of the policy, its aims and the role of members of staff in implementing and monitoring the policy. Any questions regarding the policy, should be directed to the Technical Director in the first instance. Overall



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responsibility for ensuring this policy complies with our legal and ethical obligations, and those under our control comply with it, lies with the board of directors.

### 4. Breaches of the Policy

- 4.0. Any employee who breaches this policy may face disciplinary action, and in serious cases, dismissal for misconduct or gross misconduct.
- 4.1. We may terminate any agreement or arrangement with other individuals and organisations working on our behalf if they breach this policy.

### 5. Review Period

- 5.0. This document needs to be reviewed before 13/03/2026

### 6. Amendment Log

- v1 – Document introduced
- v2 – Format review