



MODERN SLAVERY POLICY

We welcome the Modern Slavery Act and the requirements it places upon businesses in the UK to tackle and permanently eradicate all forms of slavery and human trafficking.

We have a zero-tolerance approach to modern slavery and are fully committed to preventing all forms of slavery and human trafficking from infesting our supply chain.

To this end we have agreed a 7-stage approach:

1. Policy

Endorsing this statement and 7 stage approach as our modern slavery policy, which has been agreed by the Leadership Team and has been signed at the very highest level of the organization.

We will ensure that we pay particular attention to the below provisions:

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers original identification documents
- Provides access to remedy, compensation and justice for victims of modern slavery

2. Communication and Awareness



This statement and policy shall be communicated to all staff within our organization with periodic refresher communications being posted to confirm our approach to modern slavery. In accordance with best practice, we shall post this policy and statement on our website.

3. Supply Chain

We shall write to each and every one of our suppliers and sub-contractors to confirm our approach to modern slavery and agree a collaborative approach to eradicating all forms of slavery.

We will invite our suppliers and sub-contractors to sign up to our approach and ask them to confirm their own approach to modern slavery. All supplier and sub-contractor documentation will carry a statement of confirmation that modern slavery is not within their own business or supply chain and will agree to allow random inspections and audits to confirm it.

We will periodically audit suppliers and sub-contractors to verify to test their approach to modern slavery and remove any suppliers and sub-contractors who have not taken reasonable steps to monitor its presence.

4. Training and Understanding

As well as communication and awareness, we shall undertake appropriate training for those staff involved in our supply chain and procurement processes.

5. Internal Audit

We shall periodically review our approach to anti-slavery, producing audit reports that shall be made available to relevant authorities, customers and other interested parties and shall identify any findings and in particular, any non-conformance against the act.

6. Review

This statement will be annually reviewed and updated, where appropriate by the Leadership Team and signed by the Managing Director.



7. Certification

We shall seek out opportunity to have our approach to modern slavery certificated to a national standard by a 3rd party award.

A handwritten signature in black ink, appearing to read "Ken Lawton", written over a horizontal line.

Ken Lawton

Managing Director

01/01/2023

