

Anti-Slavery and Human Trafficking Policy

Introduction

The Modern Slavery Act 2015 sets clear obligations on organisations to ensure that modern slavery (which includes slavery, servitude, forced and compulsory labour, and human trafficking) does not take place within their business or supply chains.

The Group is committed to preventing modern slavery in all its forms and ensuring transparency in its business operations and supply chains. We expect all those we work with, including suppliers and business partners, to uphold the same high standards.

Scope

This policy applies to all persons working for or on behalf of the Group in any capacity, including employees, directors, contractors, suppliers, agency workers, and business partners.

The Group's Commitment

The Group has a zero-tolerance approach to modern slavery and commits to:

- Preventing modern slavery within its business and supply chain.
- Conducting risk assessments to identify and mitigate risks related to modern slavery.
- Implementing due diligence procedures when onboarding new suppliers.
- Encouraging employees and stakeholders to report concerns regarding modern slavery without fear of retaliation.
- Reviewing and updating this policy regularly to reflect best practices and legal compliance.

Steps to Prevent Modern Slavery

The Group undertakes the following measures to prevent modern slavery:

1. **Risk Assessment:** Regularly assess which parts of the business and supply chain are at higher risk of modern slavery.
2. **Supplier Engagement:** Ensure that all suppliers are aware of and adhere to our anti-slavery policy and provide evidence of their own anti-slavery measures.
3. **Contractual Controls:** Include provisions in supplier contracts to confirm adherence to modern slavery laws and allow audits.
4. **Training and Awareness:** Provide training to employees on identifying and preventing modern slavery.
5. **Reporting Mechanism:** Establish confidential reporting procedures for employees and external parties to raise concerns about potential violations.

Compliance and Responsibilities

- **Leadership Responsibility:** The Group's Managers are responsible for ensuring compliance with this policy.
- **Employee Responsibility:** All employees must read, understand, and comply with this policy. Any suspected breaches must be reported to management immediately.
- **Supply Chain Accountability:** Suppliers and contractors must comply with this policy and demonstrate compliance when requested.

Reporting Suspicions of Modern Slavery

Employees, suppliers, or any third parties with concerns about modern slavery should report them immediately to their Line Manager or a member of the Senior Management Team. All reports will be managed confidentially.

If a concern arises outside of the Group's internal channels, individuals can contact the **Modern Slavery Helpline on 0800 0121 700** or visit www.modernslaveryhelpline.org.

Safeguards and non-retaliation

The Group ensures that no individual who reports modern slavery concerns in good faith faces any form of retaliation. Any employee found engaging in modern slavery will face disciplinary action, including possible termination.

Definitions

Slavery and servitude	Where people are dehumanised, treated as a commodity, bought, or sold as "property," have restrictions placed on their freedom or are generally exploited for someone else's gain. Slavery often involves forced or compulsory labour.
Forced or Compulsory Labour	Where someone is forced to work, or is otherwise controlled by an "employer", through coercion, mental or physical abuse, or the threat of abuse.
Human trafficking	Arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

Review and Policy Updates

This policy will be reviewed annually or sooner if any significant changes occur to ensure it remains effective, relevant, and compliant with UK law. Updates will be communicated to all employees and relevant stakeholders.

Acknowledgment

Signed	<u>Simon Fieldhouse</u> Simon Fieldhouse (Mar 13, 2025 15:47 GMT)
Name	Simon Fieldhouse
Position	Group CEO
Date	13/03/2025

G.POL.001.Compliance.Public.Anti-Slavery & Human Trafficking Policy.RV1.13.03.2025

Final Audit Report

2025-03-13

Created:	2025-03-13
By:	Jessica Pirrie (jessica.pirrie@itm.uk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA6CWdy9S8oH6ZV6NQZgdO6RZWKoonEJ0X

"G.POL.001.Compliance.Public.Anti-Slavery & Human Trafficking Policy.RV1.13.03.2025" History

-  Document created by Jessica Pirrie (jessica.pirrie@itm.uk.com)
2025-03-13 - 3:38:55 PM GMT- IP address: 31.51.193.240
-  Document emailed to Simon Fieldhouse (simon.fieldhouse@itm.uk.com) for signature
2025-03-13 - 3:38:59 PM GMT
-  Email viewed by Simon Fieldhouse (simon.fieldhouse@itm.uk.com)
2025-03-13 - 3:40:21 PM GMT- IP address: 103.109.80.85
-  Document e-signed by Simon Fieldhouse (simon.fieldhouse@itm.uk.com)
Signature Date: 2025-03-13 - 3:47:35 PM GMT - Time Source: server- IP address: 213.18.177.38
-  Agreement completed.
2025-03-13 - 3:47:35 PM GMT