

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

This Modern Slavery and Human Trafficking Policy relates to the Company's zero tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The statement sets the Company's commitment to preventing slavery and human trafficking in all of our business activities and the steps we have put in place. The aim is to ensure that there is no slavery or human trafficking in our own business. Furthermore, to carry out the requisite due diligence to check that our supply chains are acting ethically and in compliance to be consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

We expect the same standards from everyone that we work with including contractors, suppliers and other business partners. Our contracting processes are regularly monitored which includes specific exclusions against the use of forced, compulsory or trafficked labour. This applies to anyone held in slavery or servitude, whether adults or children.

This policy applies to everyone that works for us or on our behalf in any capacity.

We will keep this policy under regular review and it will be amended should any legislative changes occur which affect its content. For this reason it does not form part of any employee's contract of employment and we may amend it at any time.

Who is Responsible for this Policy?

The Company will ensure that this policy complies with its legal and ethical obligations and that all those under our control comply with it.

The Company has a day-to-day responsibility for implementing and monitoring this policy to ensure it remains effective in monitoring and handling modern slavery and human trafficking.

Management is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery and human trafficking in supply chains.

Your Obligations to Comply with this Policy

This policy is provided by means of a non-exclusive licence by K&K Legal Consulting. It may only be used by the company or person purchasing it. You may insert the name, position, date and signature at the end of the policy but you must not alter any other part of the policy without K&K Legal Consulting's expressed permission in writing. You, or anyone instructed on your behalf, may not remove or alter the wording in this footer

You must read, comply and confirm your understanding 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. Therefore, you are required:

- to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify management as soon as possible if you believe that a conflict with this policy has occurred or may occur in the future.
- and encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- to notify management if you believe or suspect a breach of this policy has occurred or that it may occur.

Where appropriate we will help anyone in our supply chain to tackle any perceived risk of coercive, abusive and exploitative working practices in their own business and supply chains. The welfare and safety of local workers is a priority.

If you suspect any ill treatment of workers, or their working conditions within our supply chains which you feel amounts to any of the various forms of modern slavery, raise it with management.

The Company will support anyone who raises genuine concerns in good faith under this policy, whether or not they are mistaken. It is our goal to ensure that no one suffers 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.

Detrimental treatment includes:

- dismissal;
- disciplinary action; and
- threats or other unfavourable treatment connected with raising a concern.

If you think that you may have suffered, or are suffering, any such treatment, you should inform management immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Company's Grievance Procedure.

This Modern (Anti) Slavery and Human Trafficking Policy is intended for businesses in all countries, especially the United Kingdom.

Communication and Training

The employee induction process will provide training in relation to the risk our business faces from modern slavery and human trafficking in its supply chains. Any updates will be provided using the Company's internal communication methods. The Company adopts a zero-tolerance approach to modern slavery and human trafficking and this must be communicated to everyone we work with at the outset of our business relationship with them and reinforced as appropriate thereafter.

Policy Breach

As an employee if you breach this policy you will face disciplinary action. This could result in dismissal for misconduct or gross misconduct. We will also take steps to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This Modern Slavery and Human Trafficking Policy has been approved and authorised by:

Name: Helen Alderson

Position: Company Director

Date:

Signature:

