

Anti-Slavery and Human Trafficking Policy

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, agents, contractors and suppliers.

We strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking Modern Slavery is a term used to encompass slavery, servitude forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We shall be a company that expects working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have zero-tolerance approach to modern slavery in our organisation and our supply chains
- The prevention, detection and reporting of modern slavery in any part of our
 organisation or supply chain is the responsibility of all those working for us or on our
 behalf. Workers must not engage in, facilitate or fail to report any activity that might
 lead to, or suggest, a breach of this policy
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risked based approach, we will assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging works through a third party to obtain that third parties agreement to adhere to the Code
 - As part of our ongoing risk assessment and due to diligence processes, we will
 consider whether circumstances warrant us carrying out audits of suppliers for

their compliance with our Code of Conduct

 If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent for the best outcome for those individuals impacted by the breach to terminating such relationships