



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, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Zero Tolerance

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We continue to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Transparency

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. This is consistent with our disclosure obligations under the Modern Slavery Act 2015.

Working with us

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude (whether adults or children). We expect our suppliers to hold their own suppliers to the same high standards.

What you must do

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery is the responsibility of all those working for us or under our control.

Prevention

You must not engage in any activity that might lead to, or suggest, a breach of this policy. If you think there might be a problem with this policy, or if you have any questions or concerns about it, you should speak to your line manager and/or our Group Risk Manager as soon as possible.

Detection

If you have any concern or suspicion that modern slavery might be taking place in any part of our business or supply chain, you must report it to your line manager and our Group Risk Manager at the earliest possible stage.

If you are unsure about whether or not a particular act, the treatment of workers more generally, or their working conditions constitutes modern slavery, we encourage you to still raise it with your line manager and our Group Risk Manager.

Reporting

If you believe or suspect that modern slavery is going on in any part of our business or supply chains, or that it may occur, you must notify your line manager and our Group Risk Manager as soon as possible. If for any reason you feel unable to speak to your line manager or our Group Risk Manager about your

concerns then we would encourage you to still report the matter in accordance with our Whistleblowing Policy.

Our commitment to you

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 is or may be taking place. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform our HR Director immediately.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Regular update training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all major suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

Consequences of breaching this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Responsibility for this policy

Each person working for us or on our behalf (in any capacity) is responsible for ensuring that they comply with their obligations in this policy. However, the following are responsible for overseeing compliance with this policy generally and on a day-to-day basis:

Our Executive Team

Has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Our Group Risk Manager

Has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Our management - at all levels

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

Contact us

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group Risk Manager.

This policy was last updated on 12 August 2021