

## **Modern Slavery and Human Trafficking Policy**

The Company is committed to ensuring that there is no modern-day slavery or human trafficking taking place within its business or within its supply chains, including subcontractors and partners.

We acknowledge the duties that organisations have under the Modern Slavery Act 2015 and will be transparent and accountable to employees, customers and others that are affected by our business activities.

As part of the Company's due diligence processes, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods and materials from sources outside of the United Kingdom and the EU are potentially more at risk from modern slavery and human trafficking issues. The level of management control required for these sources will be continually monitored. The Company will not support or deal with any business knowingly involved in modern slavery or human trafficking.

We expect our suppliers to comply with legal requirements and to adopt and adhere to the following ethical and moral principles:

### **Employment**

- Compliance with all national and other applicable law and regulations
- That there will be no forced, bonded or involuntary labour
- That all workers shall have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace
- Children and young persons under 18 shall not be employed at night or in hazardous conditions
- Wages paid for a standard working week meet or exceed national (or, where applicable, local) legal standards. In any event, wages should not be paid in kind and should be enough to meet basic needs
- All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for the pay period concerned each time that they are paid
- Standard working hours must comply with national laws and national benchmark industry standards, whichever affords greater protection to the employee
- All workers should not on a regular basis be required to work excessive hours and should be provided with adequate daily and weekly rest breaks
- Overtime requested by the employer must be voluntary and must not be requested on a regular basis
- A policy of equality for all should be in place and there should be no discrimination in hiring, pay, access to training, promotion, termination or retirement based on protected characteristics
- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice
- That there will be no harsh or inhumane treatment
- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse of other forms of intimidation shall be prohibited

### **Safe Working Conditions**

We expect our suppliers:

- To provide a safe working environment taking into account international standards, the prevailing knowledge of the industry and of any specific risks
- To take adequate steps to prevent accidents and injury occurring in the course of work by minimising, so far as is reasonably practicable, the risks inherent in the working practice and environment

- Provide workers with suitable and sufficient health and safety training, in order that they fully understand the risks associated with the work activity and environment and the correct practices required to minimise the risks
- Provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers
- To assign responsibility for health and safety to a senior management representative

### **Reporting concerns**

Where employees believe there to be any infringement of this policy or its principles, they should report the matter to a Director. Where a concern qualifies as a 'qualifying disclosure' employees should refer to the Company's Whistleblowing Policy.

### **Implementation**

The Directors shall take responsibility for implementing this policy and its objectives and shall provide adequate resources, e.g. training, and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A copy of this policy will be accessible to all employees electronically and can be obtained upon request. This policy statement will be reviewed annually.



S. G. PENNINGTON  
DIRECTOR

20/03/2022