



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

There are a great many definitions of modern slavery; they all include aspects of control, involuntary actions and exploitation.

At Anti-Slavery International, it is defined as 'when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.'

They define Human Trafficking as 'The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal'.

In the UK, there are cases covering forced and compulsory labour, slavery, debt bondage, and human trafficking. Often the practice is hidden in plain sight, such as clothing manufacture, food service, crop picking, factory work, and working in forced servitude in private houses as cooks, cleaners or even nannies.

According to the Global Estimates of Modern Slavery (2022), it estimates the following figures;

- 49.6 million people live in modern slavery – in forced labour and forced marriage
- Roughly a quarter of all victims of modern slavery are children
- 22 million people are in forced marriages. Two out of five of these people were children
- Of the 27.6 million people trapped in forced labour, 17.3 million are in forced labour exploitation in the private economy, 6.3 million are in commercial sexual exploitation, and nearly 4 million are in forced labour imposed by state authorities.

This policy sets out the Company's zero-tolerance approach to modern slavery, and we are committed to ensuring modern slavery practices are not occurring within our own business or in the business dealings of our suppliers, contractors and business partners. We fully adhere to our obligations regarding ethical working practices and transparency under the Modern Slavery Act 2015.

When entering into a contract with a supplier, contractor or business partner, the Company's due diligence process will seek to ensure that contractual terms prohibit modern slavery and human trafficking. The Company expects all parties to uphold this commitment to preventing modern slavery.

This policy applies to all employees and workers at every level of the Company, from the Board of Directors to front-line workers and employees who work in any capacity. It also applies to contractors, agency workers, consultants, suppliers, business partners, and any other individuals or organisations acting on behalf of, or providing services to, the Company.

Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Directors are responsible for implementing this policy so that it is embedded in all systems of work. Managers are responsible for ensuring control systems are in place and that they are audited. They must ensure all team members are trained on the policy and how to look for signs and report any concerns; they are also responsible for ensuring any modern slavery allegations or concerns are investigated.



Compliance

It is the responsibility of everyone working for the company, its various sites, departments or divisions to be vigilant for the signs of modern slavery in operation and to report those concerns.

If you believe modern slavery practices are taking place in any of the Company's supply chains, or if you have evidence of such activity, you must raise those concerns without delay. Please raise the concern with your line manager.

For further information, guidance and support relating to modern slavery and human trafficking, individuals can contact:

- **Modern Slavery & Exploitation Helpline:** 08000 121 700, www.modernslaveryhelpline.org
- **The Salvation Army Modern Slavery Referral Helpline:** 0800 808 3733 (24-hour confidential support for adult victims in England and Wales)
- **The Salvation Army UK General Enquiries:** 020 7367 4500, info@salvationarmy.org.uk

No one will suffer detrimental treatment if the concern raised in good faith turns out to be a mistake. Support will be given to anyone who raises a concern, for the sake of any individuals who may be affected. The Company will always investigate any concern raised.

Training and communication

All team members will have access to this policy and receive training in its implementation.

The Company's zero-tolerance regarding modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

The warning signs to look out for:

There may be tell-tale signs that indicate a colleague is experiencing difficulties or may be at risk of exploitation. As you work closely with your colleagues on a day-to-day basis, you may be more likely to notice changes in behaviour or other warning signs than a manager or supervisor, who may have less direct contact with team members. Please do not assume that someone else will identify or raise concerns. If you notice anything that causes concern, it is important to report it through the appropriate channels.

This may include:

- Workers showing signs of physical abuse and/or appearing malnourished or unkempt
- Workers who seem to have few personal possessions or often wear the same clothes
- Workers who appear frightened or reluctant to talk to others
- Workers who are dropped off or collected for work by the same person regularly, possibly very early or very late at night.

Once you have alerted us to a concern, we will speak in confidence to the individuals concerned, as intervention is important if the situation is to be stopped and a victim of modern slavery helped.



We are committed to supporting any employee found to be a victim of modern slavery, and we will offer appropriate support, which may include access to counselling and reasonable time off to address related matters. We will also investigate and report any suspected supply chain concerns.

Signed by:

Richard Mather

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30/07/2026