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## Anti-Slavery and Human Trafficking Policy

This policy is written to help the Company comply with the Modern Slavery Act 2015. It gives workers, contractors and other business partners guidance on slavery and human trafficking and the measures taken by the Company to tackle slavery and human trafficking in the business and its supply chains. This should be read in conjunction with the annual Slavery & Human Trafficking Statement published annually on the Company's website.

### Who is covered by this policy?

The 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.

### What is Modern Slavery?

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 one person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to:

- acting ethically and with integrity in all our business dealings and relationships
- implementing and enforcing effective systems and controls to ensure, insofar as we are able, modern slavery is not taking place anywhere in our business or in any of our supply chains
- ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains
- acting consistently with our disclosure obligations under the Modern Slavery Act 2015

We expect the same high standards from all 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; and we expect that our suppliers will hold their own suppliers to the same high standards.

### Compliance with the policy

- You must ensure that you read, understand and comply with this policy as 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.
- You must notify your manager, a director or human resources as soon as possible if you believe or suspect a conflict with this policy has occurred or may occur in the future.
- You are 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.
- If you believe or suspect a breach of this policy has occurred (or that it may occur) you must notify a member of the senior management team or report it in accordance with our Whistle Blowing Policy as soon as possible
- If you are unsure about whether a particular act, the treatment of workers, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery you should raise it through the human resources manager or a member of the senior management team.
- 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; and we are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions of acts of modern slavery taking place.

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## **Communication and awareness of this policy**

All individuals who work for us will receive training on this policy as part of training on the content of the employee handbook. Separate training on the risks our business faces from modern slavery in its supply chains will be provided as necessary to those personnel directly involved in matters involving our supply chains.

Our zero-tolerance approach to modern slavery will be communicated to all new suppliers, contractors and business partners at the outset of our business relationship with them; and to all existing suppliers, contractors and business partners as and when we are reviewing or revising our terms of business with them. Thereafter it will be reinforced as appropriate.

## **Breaches of this policy**

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

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