

## **MODERN SLAVERY ACT 2015**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. For further information, please see your Line Manager. Alternatively, any concerns in this regard should be raised through the Whistleblowing Policy.

## **Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes within our operations and supply chain:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.
- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of reauditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to abide by our code of supplier conduct and address modern slavery concerns in their policies.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

## **Our Training**

All of our staff receive training and support that is appropriate to their role. In particular:



- Our leadership and Operations team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have.

Training is refreshed annually.