Introduction

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the Company policy with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain.

As a Company, we have a corporate value of zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with our policy and to act at all times in a way that is consistent with our anti-slavery value.

Steps for the Prevention of Modern Slavery

We are committed to ensuring there is transparency in our own business and expect the same level of commitment with regard to the prevention of modern slavery from our sub contractors, suppliers and other business partners.

The Company's Whistleblowing Policy and Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees via this route.

Aside from the Whistleblowing Policy and Procedure, any concerns can be confidentially raised with the HR Manager by direct communication.

Separate to this policy, the UK Government provides a 24-hour modern slavery helpline. This helpline number is available to all Company employees.

Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring that no one suffers detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action or other unfavourable treatment connecting with raising a concern.

Any claims that are malicious or vexatious will result in disciplinary action being taken against the individual.

Anonymously raised concerns will limit their investigation and will render this process more difficult. Individuals are therefore encouraged to put their names to allegations they raise.

Responsibility for this Policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of Management of the Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Communication and Awareness of this Policy

This policy has been communicated to all employees via our Employee Handbook and included in the induction process.

Our supply chain has been made aware of this policy.

Review

Following its initial adoption, this Policy will be review by the Board of Management on a regular basis and may be amended from time to time.

Michael Fraser



Managing Director

30th January 2024