

Anti-slavery and human trafficking policy

1. Policy statement

In meeting with our obligations under the Modern Slavery Act 2015 the company offers the following statement as our contribution in the prevention of modern slavery.

Modern slavery can take various forms, such as, servitude, forced or compulsory labour and human trafficking. The Company has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity and transparency in all of our business dealings and relationships.

We are also committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or supply chains, consistent with our obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

2. 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.

The Directors have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

The Directors are responsible for ensuring that those reporting to them understand and comply with this policy, having taken relevant Professional advice.