

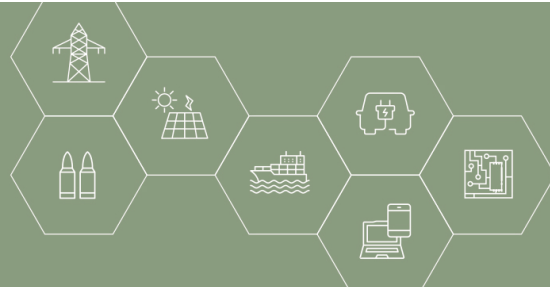
1. Anti-Slavery Policy

1. Purpose and Scope

- 1.1 [COMPANY NAME] ('the Company') has designed this policy in recognition of and compliance with The Modern Slavery Act 2018 – “The Act”.
- 1.2 The Company has a strict no tolerance for slavery and human trafficking in any part of the business, including our suppliers.
- 1.3 The Company has policies in place to ensure all employees have the right to work and be paid fairly, that it acts with integrity and ethically, and that it has effective measures in place to ensure slavery is not present anywhere within the business or its suppliers.
- 1.4 This includes our [Equal Opportunities] policy, which encompasses recruitment, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, shareholders and other stakeholders.

2. Policy statement

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. Its forms include, slavery, servitude, forced and compulsory labour and human trafficking, all of which deprive a person of liberty by another in order to exploit them for personal or commercial gain. The Company is committed to acting ethically and with integrity in all business dealings. It undertakes to implement and enforce systems and controls to ensure modern slavery is not taking place anywhere within the Company or that of our suppliers.
- 2.2 The Company is committed to transparency within the business and in its approach to tackling modern slavery; consistent with our obligations under the Modern Slavery Act 2015. The Company has high standards for all of our contractors, suppliers and other business partners, and the Company contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. It is our expectation that suppliers will hold their own suppliers to the same high standards.
- 2.3 This policy does not form part of any employee’s contract of employment and we may amend it at any time.



3. Compliance with the policy

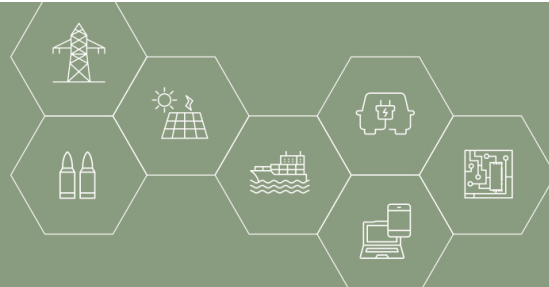
- 3.1** All employees must ensure that they read, understand and comply with this policy.
- 3.2** The prevention, detection and reporting of modern slavery in any part of the business or our suppliers is the responsibility of all those working for and with us. All are required to avoid activity that might lead to, or suggest, a breach of this policy.
- 3.3** All employees must notify management as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4** Employees are encouraged to raise suspicion of modern slavery in any parts of the Company or suppliers, at the earliest possible stage.
- 3.5** Any suspected breach of this policy requires notification to management as soon as possible.
- 3.6** Any employee unsure about whether a particular act, treatment of workers, or their working conditions within any level of supplier falls under any level of modern slavery, raise it with the management.
- 3.7** The Company aims 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. Allegations of such conduct will be investigated. All reasonable efforts will be made to obtain all relevant information. The Company is committed to ensuring no one suffers any negative treatment as a result of reporting their suspicion in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our [Grievance Procedure].

4. Communication and awareness of this policy

- 4.1** Training on this policy, and on the risk our business faces from modern slavery within suppliers businesses, forms part of the induction process for all individuals who work for the Company, and regular training will be provided as necessary.
- 4.2** Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this policy

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



- 5.2** Breach of Company policy will be dealt with according to this policy. Immediate termination of employment is a possible outcome in appropriate cases.

File Name:	Anti-Slavery Policy
Implementation Date:	[insert]
Review Date:	[insert]
Version:	1.0