



Introduction

Modern slavery is a crime and a violation of fundamental human right. It takes various forms such as slavery, servitude, forced and 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. 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 and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the *Modern Slavery Act 2015*. We expect the same high standards from all of our contractors, suppliers and other business partners, and 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 suppliers will hold their own suppliers to the same standard.

This 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.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligation, and that all those under our control comply with it.

The Compliance Director has primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern day slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate instruction.

You are invited to comment on this policy and suggest ways in which it might be improved. comments, suggestions and queries are encouraged and should be addressed to the compliance director.

Compliance with the Policy

- You must ensure you read understand and comply with this policy
- You must notify your manager or the compliance director as soon as possible if you believe or suspect that 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 your manager or report it the Compliance Director immediately.
- If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery raise it with your manager or the compliance director.

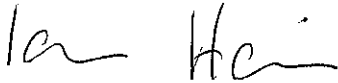
We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any 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 threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment you should inform the Compliance Director immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure.



Breaches of this Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Signed.....

Mr Ian Harrison
Human Resources Manager

Date: April 2019