

## MODERN SLAVERY & CHILD LABOUR POLICY

## **SEC Commitment**

The Company has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity and transparency in its business dealings and relationships, implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from 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.

We also require all of our suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular:

- (a) children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and
- (b) those under 18 must not be required to perform hazardous duties

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.

Directors, Management and Supervisory staff all have responsibilities for the implementation of this policy, ensuring compliancy with the Company's legal and ethical obligations. Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

If it is believed or suspected that a breach of or conflict with this policy has occurred or may occur, it will be investigated in accordance with the Company's procedures. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery and / or Child labour.

G Dines

Director January 2023