SLAVERY & HUMAN TRAFFICKING POLICY



Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. This Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our initiative to identify and mitigate risk:

- Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point of contact is preferably
 with a UK company or branch and we expect these entities to have suitable anti-slavery
 and human trafficking policies and processes
- We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain

It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

 We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

We have at our disposal the following Key Performance Indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of premises Audits by Safety, Health and Environmental Managers and consultants
- Use of labour monitoring and payroll systems to check eligibility of employees in the UK
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

Signed:

Steve Birt, Managing Director