

Anti-Slavery and Human Trafficking Policy

Purpose

The Company recognises that slavery and human trafficking remains a problem in global society and accepts responsibility for making all of its employees aware of the issue and will monitor our wider supply chain for compliance. Employees will be expected and encouraged to report concerns to management, who in turn will be required to act upon them.

Scope

This policy applies to all employees.

Principles

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy Statement 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.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Aims

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):-

- More stringent checks of our contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

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.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees to act.
5. Equality & Diversity Policy. We are an Equal Opportunity employer and we believe in a diverse workforce helps enrich employment, training, innovation and individual and organisational development. We are committed to ensuring that our employees are able to work in an environment free from unlawful discrimination, and that promotes equality of opportunity and good relations between its employees. It is the Company's policy to ensure that all staff and job applicants are treated fairly, regardless of sex, sexual orientation, religion or belief, race, colour, nationality, ethnic or national origin, age, marital status, civil partnership status, gender reassignment, pregnancy or disability.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- Ongoing risk assessments and due diligence processes provide no evidence that modern slavery practices have been identified.
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- No non-conformances are raised through the audit process in relation to breaches of the policy or the regulations.

Name: **Louis Sabet**

Position: **Managing Director**

Signed: 
[Louis.Sabet \(Sep 24, 2024, 08:50 GMT+1\)](#).....

Date: **Sep 24, 2024**