

## **Anti-Slavery and Human Trafficking Policy**

### **1. POLICY STATEMENT**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. 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.
- 1.2 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 taking steps to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 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 our contractors, suppliers and other business partners, and as part of our contracting processes.
- 1.4 This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **2. RESPONSIBILITY FOR THE POLICY**

- 2.1 The board of directors have overall responsibility for ensuring this policy statement complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 2.3 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 local legal manager.

### **3. COMPLIANCE WITH THE POLICY**

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 It is the responsibility of all employees, contractors and those working for us to assist in the prevention, detection and reporting of modern slavery in our business and/or supply chain. As such, you are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager, or the Legal Team, or the local HR Team, or the confidential Whistle-blower hotline as soon as possible if you believe or suspect that a breach or a conflict with this policy has occurred, or may occur in the future.
- 3.4 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 to your manager, or the Legal Team, or the local HR Team, or the confidential Whistle-blower hotline
- 3.5 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 Legal Team, or the local HR Team, or the confidential Whistle-blower hotline
- 3.6 We aim 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. 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.

### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1 Our zero-tolerance approach to modern slavery must be communicated to 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 Any employee who breaches this policy will face disciplinary action, which could result in dismissal.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.