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Approver Name:	Vanessa Hughes
<b>Administered</b> by Function:	Human Resources
Administrator Name:	Rebecca Ackroyd
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*(see Cardo-HR-P003 Business Management Systems Change Authority)*

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1	Version 1	V Hughes	01/05/2025
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## 1. Purpose

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 to exploit them for personal or commercial gain. 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 any of 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 our suppliers will hold their own suppliers to the same high standards.

### **The purpose of this policy is to:**

Set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking;  
and

Provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

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## 2. Governance, Ownership and Accountability

Overall responsibility for the implementation and effectiveness of this policy sits with the Company's senior management. The HR Director has day-to-day responsibility for ensuring this policy is applied consistently across the business and for monitoring compliance.

The Board has overall oversight of modern slavery and human trafficking risks and approves the Company's annual Modern Slavery Statement in accordance with the Modern Slavery Act 2015.

Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and for taking appropriate action where concerns are identified.

## 3. Your Responsibilities and How to Raise a Concern

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or HR as soon as possible if you believe or suspect that a breach of 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.

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If you believe or suspect that a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.

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 HR.

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.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a member of HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### **4. Risk Assessment and Due Diligence**

We recognise that the risk of modern slavery varies by sector, geography, and supply chain structure. We take a risk-based approach to identifying and managing modern slavery risks within our business and supply chains.

As part of our due diligence processes, we may:



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- Assess modern slavery risk when engaging new suppliers or contractors
- Require suppliers to confirm compliance with this policy and applicable laws
- Include contractual provisions prohibiting modern slavery and human trafficking
- Carry out risk-based reviews or audits of suppliers where appropriate

Suppliers and contractors are expected to cooperate with our due diligence processes and to address any identified issues promptly. Where unacceptable risk or non-compliance is identified, we reserve the right to take appropriate action, including termination of the business relationship.

## 5. Training And Communication

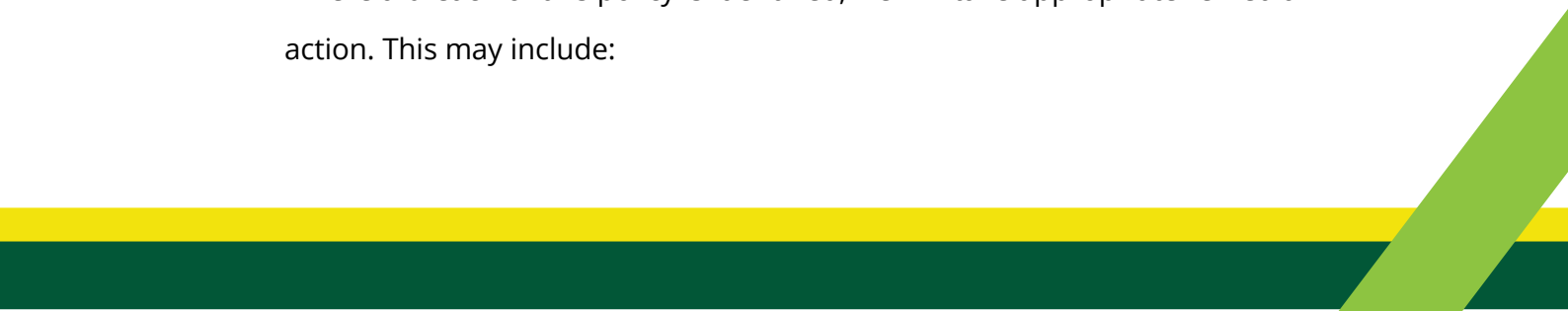
It is your responsibility to familiarise yourself with this policy. We will provide training as necessary to mitigate the risk our business faces from modern slavery in its supply chains.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

## 6. Reporting, Investigation and Remedial Action

All concerns raised under this policy will be taken seriously and investigated promptly, fairly, and sensitively.

Where a breach of this policy is identified, we will take appropriate remedial action. This may include:



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- Working with suppliers or contractors to address and remedy issues
- Reporting matters to relevant authorities where required
- Taking steps to safeguard affected individuals
- Terminating relationships where remediation is not possible or appropriate

We are committed to ensuring that no one who raises a genuine concern in good faith suffers any form of retaliation or detrimental treatment.

## 7. Breaches of 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 organisations working on our behalf if they breach this policy.

## 8. Monitoring and Review

This policy is reviewed annually and updated as necessary to reflect changes in legislation, organisational structure, business activities, or risk profile.

The effectiveness of this policy and associated procedures is monitored as part of the Company's ongoing governance and reporting processes, including preparation of the annual Modern Slavery Statement.