

## Modern Slavery and Human Trafficking Policy

The Company is committed to ensuring that there is no modern slavery or human trafficking, including forced labour, bonded labour or prison labour in our business or our supply chains. This Policy affirms the Company's intention to act ethically in our business relationships.

**Modern slavery** is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking.

**Forced labour** is any work or services which people are forced to do against their will under the threat of some form punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour.

**Bonded labour** is the most widespread – yet the least known - form of slavery in the world. A person becomes a bonded labourer when their labour is demanded as a means of repayment for a loan. The person is then tricked or trapped into working for very little or no pay.

**Prison labour** is a generic term for various kinds of unfree labour which prisoners are required to perform, typically manual labour. The work may be light or hard, depending on the context. Forms of sentence involving penal labour have included involuntary servitude, penal servitude and imprisonment with hard labour.

The policy sets down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains. A Whistleblowing policy is available from the Company and contained within the Employment Manual for reference.

### Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

### Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including the requirement of all relevant staff to have completed training on modern slavery by use of labour monitoring and payroll systems.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorse this policy statement and is fully committed to its implementation.