

## Business Management System

### Section 1: Administration

## Part 8– Anti-slavery and Human Trafficking Policy

Document Record		
Rev	Changes	Date
1	Original	1st September 2023
2	Review	30 <sup>th</sup> August 2024
3	Review	27 <sup>th</sup> August 2025

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

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including, forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

This company has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015 as well as human rights as set out by the principles of the International Labour Standards Guiding Principles.

This company expects our contractors and suppliers to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. We expect their suppliers to hold these high standards. We will be auditing our higher risk suppliers, as determined by our predetermined criteria.

This policy applies to all persons working for, or on behalf of this company, in any capacity. This includes but does not limit the policy applicability to, employees, agency workers, temporary staff, agents, contractors, external consultants and third-party representatives.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

All employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

You must notify your manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future.

Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage.

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal. We may terminate our relationship with other employees, suppliers and any other associates working with us if they breach this policy.

A handwritten signature in blue ink, appearing to be "JS", located in the upper right quadrant of the page.

**Jamie Spinks, Director**

**27<sup>th</sup> August 2025**