

Anti-Slavery and Human Trafficking Policy

18 August 2021



Policy statement

Modern Slavery is an abuse of the human rights of vulnerable workers by slavery, servitude, forced or compulsory labour and human trafficking. The Modern Slavery Act 2015 obliges the Company to exercise due diligence to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This Policy applies to all **Relevant Persons** being any individual working for the Company, under its control, on its behalf or in its supply chain, including directors, employees, agency workers, suppliers, subcontractors and others in the supply chain.

This Policy is approved by the board of the Company which is responsible for ensuring that it complies with the Company's legal and ethical obligations; for training, implementing, monitoring and auditing its use; and investigating alleged breaches. Directors and line managers are responsible for ensuring that those reporting to them understand and comply with this Policy.

Compliance

The Company has a zero tolerance approach to Modern Slavery and is committed to ensuring that Modern Slavery and human trafficking are not taking place in its own business or in its supply chain.

All suppliers, subcontractors and others in the supply chain are required to comply with this Policy which is communicated at the time of placing orders and by a provision in orders where appropriate.

Relevant Persons must avoid any activity that might lead to a breach of this Policy. They may contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on Modern Slavery.

Relevant Persons must notify a line manager or director as soon as possible if they

- believe or suspect a breach of or conflict with this Policy has occurred or may occur.
- have concerns about any issue or suspicion of Modern Slavery in any part of the Company's business or supply chain
- are unsure about whether a particular act, the treatment of workers or their working conditions in any part of the Company's business or supply chain constitutes any of the various forms of Modern Slavery.

The Company encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they are mistaken; and it is committed to ensuring no one suffers any detrimental treatment or victimisation as a result.

Breach of the Policy

Any employee who breaches this Policy will face disciplinary action, up to and including summary dismissal for gross misconduct. The Company may terminate its commercial relationship with suppliers, subcontractors and others in the supply chain if they breach this Policy and/or are found to have been involved in Modern Slavery.

Signed:



Date: 18 August 2021

Gdert-Jan Peeters, Managing Director

