



Anti-Slavery and Human Trafficking Policy

QAP018



Do the right thing



Be the difference



Love our customers



Never settle



Look forward

1. PURPOSE

- 1.1 The purpose of this policy is to ensure full compliance with all applicable Anti-Slavery and Human Trafficking legislation, including the UK Modern Slavery Act 2015. The Company is committed to acting ethically, transparently, and with integrity in all business dealings and relationships. This includes implementing effective systems, controls, and due-diligence processes to prevent, identify, and address any risk of modern slavery or human trafficking within our own operations, supply chains, and business partnerships.

2. SCOPE

- 2.1 This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, this includes but is not limited to employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

3. PROCES INPUTS, CONTROLS, OUTPUTS and RESOURCES

3.1 Inputs

- UK Modern Slavery Act 2015 and relevant international labour standards
- Existing internal policies (Code of Conduct, Whistleblowing, Procurement, HR)
- Supplier data, country/category risk profiles, and due-diligence information
- Audit findings, incident reports, nonconformance records
- Customer requirements, questionnaires, and contract obligations
- Employee feedback, worker-representative input, NGO/government advisories

3.2 Controls

- Board and leadership oversight with named policy owner
- Document control (versioning, periodic review)
- Defined responsibilities (procurement, HR, operations, legal, compliance)
- Risk-based supplier onboarding and segmentation
- Mandatory modern-slavery clauses in contracts and purchase orders
- Supplier vendor-assessments (VAQs) – and resultant risk rating
- Training, inductions, and refresher cycles
- Confidential whistleblowing channels and reporting mechanisms
- Incident intake, investigation, escalation, and victim-centred remediation
- Monitoring and KPIs (training rates, audit completion, CAPA closure time, incident rate)
- Management review and continuous-improvement cycle; annual statement approval/publication

3.3 Outputs

- Published Modern Slavery Statement (annual)
- Controlled, up-to-date Anti-Slavery and Human Trafficking Policy
- Supplier risk analysis and VAQ due-diligence reports
- Audit reports with corrective actions and closure evidence
- Training completion records and competency evidence
- Supplier communications (policy, contractual additions)
- Incident reporting, investigation findings, and remediation outcomes
- KPI dashboards, performance reports, and management-review minutes
- Supplier approval, improvement plans, suspension, or termination decisions

3.4 Resources

- People: policy owner, executive sponsor/Board , procurement, HR, legal/compliance, ESG/QHSE, site/operations, internal audit; external audit/SMEs
- Systems/process: ERP/procurement, third-party risk & screening, audit/CAPA tracker, whistleblowing/case-management, document control/QMS SharePoint system.
- Documents/templates: supplier code of conduct, modern-slavery clauses, PO Ts&Cs, VAQs, audit checklists, incident/investigation forms, KPI and management-review packs
- Budget/time: allocations for training, audits, due diligence, external legal/assurance/translation support; time for governance meetings and reviews
- External references: government/NGO guidance (e.g., ILO (International Labour Organisation), Ethical Trading Initiative), industry initiatives and employee feedback mechanisms.

4. RISKS AND OPPORTUNITES

Description	Risk HML/Opportunity	Controls
Potential presence of modern slavery within supply chains.	M – exposure to unethical labor practices. Opportunity: strengthen supplier due-diligence and enhance ethical sourcing reputation.	Risk-based supplier assessments, VAQs, audits, contractual clauses, ongoing monitoring.
Lack of employee awareness of modern-slavery indicators.	M – low detection of concerns. Opportunity: build a more informed and responsible workforce.	Mandatory training, inductions, refresher sessions, targeted communications.
Insufficient reporting mechanisms for workers to raise concerns.	M: issues remain hidden. Opportunity: improve transparency and early detection.	Confidential reporting channels, whistleblowing system, investigation procedures.
Non-compliance with Modern Slavery Act or legal obligations	H - legal penalties and reputational damage. Opportunity: strengthen governance and demonstrate transparency to stakeholders.	Annual statement publication, policy reviews, Board oversight

5. PERFORMANCE INDICATORS

Aim of Process	PI	Measurement	Objective
Ensure legal compliance and transparency.	Publication of the Modern Slavery Statement on time.	% of years the statement is board-approved and published by the statutory deadline.	100% annually.
Maintain up-to-date policy governance.	Policy review and approval period.	Days since last review; evidence of version control and approvals.	Review at least every 12 months; 0 overdue reviews.
Strengthen supplier onboarding and compliance assurance	Supplier contracts with modern-slavery clauses.	% of active supplier contracts/PO Ts&Cs containing required clauses.	100% of new and renewed contracts with signed declaration.
Improve visibility and management of supplier risk.	Number of supplier risk assessments completed.	Count per reporting period (monthly/quarterly/annual).	All high-risk suppliers assessed within cycle.
Ensure monitoring of high-risk suppliers	Number of supplier audits conducted based on risk indicators	Count of audits completed versus audits planned for high-risk suppliers	≥ 95% of scheduled audits completed
Ensure all new employees understand modern-slavery risks from day one	% of new employees receiving anti-slavery training during induction	Number of new starters trained / total new starters × 100	100% completion
Maintain ongoing awareness and competency in the workforce	All existing employees to observe UK anti-slavery Day (18 th October) awareness campaign annually	Number of employees receiving awareness campaign..	100% completion per year.
Detect and manage potential exploitation or non-compliance.	Number of confirmed incidents of modern slavery reported or identified.	Count of verified incidents within reporting period.	0 incidents — or full investigation & remediation where identified.

6. PROCEDURES

6.1 Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour, child labour and human trafficking. The Company has a zero tolerance approach to modern slavery including child labour and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, including child labour and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes 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.

6.2 Compliance

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

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your Line Manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your Line Manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

6.2.1 Reporting Suspected Cases of Modern Slavery

The following step-by-step guide outlines the process:

- Step 1: Identify Suspicion – Recognize signs of modern slavery, such as poor working conditions, restricted freedom of movement, or lack of health and safety measures.
- Step 2: Notify Line Manager – If you suspect a breach of this policy, report your concerns directly to your Line Manager.
- Step 3: Use Disclosures in the Public Interest Policy – report the issue through the Company's Disclosures in the Public Interest Policy. QAP013.
- Step 4: Contact Modern Slavery Helpline – If unsure, consult the government's Modern Slavery Helpline at 0800 0121 700 for further guidance.
- Step 5: Ensure Confidentiality and Good Faith – Remember that the Company supports employees who raise concerns in good faith and ensures confidentiality.

6.3 Training and Communication

Training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

6.4 Breach of 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, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

7. RESPONSIBILITY

7.1 The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

7.2 The Finance Director has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

7.3 Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

8. DOCUMENTS

- 8.1** QAP013 - Disclosures in the Public Interest Policy (Whistleblowing)
- QFP005 - Anti-Bribery and Anti-Corruption Policy
- QPP002 – Supplier Adoption Evaluation and Re Evaluation
- QDP008 – Environmental Social and Governance (ESG) Policy
- QAP007 – Equality, Diversity, Inclusion & Belonging
- QQP013 – Statement of Values and Business Ethics Code



Andrew Marr
Finance Director

Version control

Creator	Authorised by	QA Authorised by	Issued/Version
P. Hall	A. Marr	G. Taylor	5/05-02-2026
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A Marr	G. Hepburn	P. Hall	3/05-12-2024
M Carter	A Penny	P Hall	2/12-10-2022
M Carter	S Inchbald	P Hall	1/10-08-2016
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