



A30 - ANTI-SLAVERY & HUMAN TRAFFICKING

This document contains the Company's Anti-Slavery and Human Trafficking Policy. The rules in this policy apply to all employees, workers, contractors and other business partners.

GENERAL PRINCIPLES

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 in order to exploit them for personal or commercial gain. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any of the Company's supply chains.

The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the Company's disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Company expects that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Company in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

RESPONSIBILITY FOR THE POLICY

The Company's Board of Directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company Secretary.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains 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, or suggest, a breach of this policy.

You must notify your manager OR the Company Secretary as soon as possible if you believe or suspect that a conflict with 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.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Company Secretary or report it in accordance with our Public Interest Disclosure Policy (A35) 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 the Company Secretary.

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 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 the Company's own business or in any of the Company's 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 the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

COMMUNICATION AND AWARENESS OF THE POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

BREACH OF THE POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Company may terminate its relationship with other individuals and organisations working on the Company's behalf if they breach this policy