

MODERN SLAVERY POLICY

Modern slavery statement for financial year ending December 2022.

According to the International Labour Organisation, more than 40 million people worldwide were subjected to forced labour in 2016. We do not tolerate forced labour either within our business itself or within our supply chain. We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

We have reviewed our business and our supply chain. Neither we nor, to the best of our knowledge, our supply chain make use of forced labour. We have taken the following steps to assess and manage any risk that our supply chain may use forced labour:

- We have adopted a Modern Slavery Policy and a Supplier Code of Conduct which rejects the use of forced labour.
- We request our significant suppliers to implement the principles in our Modern Slavery Policy and the Supplier Code of Conduct relating to forced labour and to impose the principles on their respective suppliers.
- When entering into arrangements with suppliers, suppliers undergo a supplier approval process in which we assess them from a qualitative and economic perspective. As part of that assessment, we are alert for any indicators of forced labour.
- We may impose contractual obligations on suppliers under which they: undertake to comply with our Supplier Code of Conduct; warrant that their business and, to the best of their knowledge, their own supply chain do not use forced labour; agree to provide us on request with responses to a self-assessment questionnaire regarding use of forced labour and steps they have taken to ensure it is not used by them or their supply chain.
- agree to permit us and third parties acting for us to inspect their facilities, records and practices, to have access to their personnel and to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of forced labour.
- impose equivalent obligations on their own suppliers.
- Where possible, we aim to review statements published by our suppliers on use of forced labour to ensure that they in turn are taking what appears to us to be appropriate steps.
- We have prepared this statement for the purposes of the Modern Slavery Act 2015. References in the statement to “forced labour” mean any conduct which is an offence under Part I of that Act including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

Approved by the Board of Directors on 31st January 2023.