



Modern Slavery & Human Trafficking Statement

Introduction

This statement sets out the Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of our industry and sector, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers all the business activities of the Company.

This statement covers all jurisdictions whether in the UK or overseas.

This statement covers all the supply chains that the Company uses.

The Company commits to applying the most appropriate levels of risk assessments in relation to slavery or human trafficking.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies – The Directors are responsible for the production and implementation of all policies.
- Risk assessments – The Directors will delegate to the most appropriate management level for completion and will overview all risk assessments
- Investigations/due diligence – The Directors acknowledge that they are ultimately responsible for all investigations and all due diligence of the supply chain.
- Training – The Directors will ensure that their workforce is guided and trained regularly in this matter.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Whistleblowing policy

The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Managing Director at any time.

Employee code of conduct

The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating at home and abroad and managing its supply chain.

Supplier / procurement code of conduct

The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics.

Suppliers are required to demonstrate that they; provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

Recruitment policy

The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through the Company's own staff/third party auditors, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating an annual risk profile for each supplier.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditors and requiring them to implement action plans.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.
- using ethical supplier databases, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The Company has reviewed its key performance indicators (KPIs). As a result, the Company is:

- requiring all staff to have completed training on modern slavery.
- developing a system for supply chain verification whereby the Company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the Company evaluates all existing suppliers.

Training

The Company requires all staff within the Company to complete training on modern slavery.

The Company's modern slavery training covers:

- supply chain conditions, which should therefore be designed to; prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- what external help is available, for example through the Modern Slavery Helpline, Gang Masters and Labour Abuse Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

Signed on behalf of the board.



James Newsome
Managing Director
Date; January 2024