

# The Modern Slavery Act - Anti-Slavery and Human Trafficking Policy Statement

The Company is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, The Company will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

## Rationale

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement thus defines The Company's commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how The Company will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

The Company has appointed its Chief Executive Officer as its senior compliance officer (its Anti-Slavery and Human Trafficking Officer) and will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners (collectively by it “Suppliers”) worldwide.

All Suppliers are therefore required to adhere to the following:

## Definitions

**Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

**Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

## Requirements for Suppliers:

1. Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
2. Will ensure that the overall terms of employment are voluntary;
3. Will comply with the minimum age requirements prescribed by applicable laws
4. Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
5. Will abide by applicable law concerning the maximum hours of daily labour;
6. Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and

## Certification

Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

## Audits

Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction of The Company. The Company may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.

## Reporting

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting The Company Chief Executive Officer (in his capacity Anti- Slavery and Human Trafficking Officer).

## Consequences

The Company takes any breach of this Policy extremely seriously.

Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with The Company terminated immediately, without compensation.

If a supplier to The Company is found in violation of this policy, The Company will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.



**Dan Holland**  
**Joint Chief Executive Officer**