

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

STATEMENT:

WE TAKE A ZERO-TOLERANCE APPROACH TO SLAVERY AND HUMAN TRAFFICKING IN ANY PART OF OUR BUSINESS RELATIONSHIPS

It is our policy to conduct all of our business in an honest, transparent and ethical manner. We take a zero-tolerance approach to slavery and human trafficking in any part of our business relationships, including our supply chain and contractors.

This policy sets out our commitments in accordance with the Modern Slavery Act 2015. International Labour Organisation (ILO) conventions and the Universal Declaration of Human Rights. We prohibit and condemn employment of underage children and forced labour, as well as any form of abuse, violence, harassment, intimidation and discrimination.

We clearly expect our supply chain and customers to adopt the standards set out in our Code of Conduct by:

- Promoting equal opportunities and fair treatment of its employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, age and political or religious conviction.
- Respecting the personal dignity, privacy and human rights of each individual.
- Refusing to employ or make anyone work against their will.
- Prohibiting behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- Providing fair remuneration and guarantee at least the applicable national statutory minimum wage and holiday.
- Complying with the maximum number of working hours laid down in the applicable laws.
- Recognising the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions. ILO Convention No.98 shall be observed.

- Employing only persons who have reached the minimum legal age for work set out by statutory provisions in the country of employment and not to tolerate any form of child labour. ILO Convention No. 138 on the Minimum Age for Employment and No. 182 on the Elimination of the Worst Forms of Child Labour shall be observed.
- Taking best reasonably possible precautions and set measure in place to safeguard the health of all employees at work.

We have developed a comprehensive due diligence programme designed to help us identify whether there is evidence of modern slavery and human trafficking within our supply chain as part of our onboarding process and reserve the right to audit our suppliers on this matter.

We have in place a robust recruitment and onboarding process to ensure our values and expectation set out in this Policy are met.

To raise awareness of modern slavery and human trafficking we conduct regular online and face-to-face training to our front-line roles such as procurement, strategic supply chain and senior managers.

This policy is reviewed and approved by the Board of Directors on an annual basis and communicated to all level via our communication channels.



Robert Campbell
Chief Executive Officer