

Ethical Trading Policy

Ethical Trading Policy - Anti-Slavery and Human Trafficking

1. Introduction

- 1.1. The Ethical Trading Policy (Anti-Slavery and Human Trafficking) policy sets out the Organisation's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chain.
- 1.2. This policy will be made available to all employees by including it in our Employee Handbook. It will be displayed on our Company website, with copies of previous documents, to show our commitment of continued transparency to the public and monitoring in this area.

2. Responsibilities

- 2.1. We will take the necessary steps to ensure slavery and human trafficking is not taking place in our supply chain, labour force or any part of our business.
- 2.2. We oppose any use of slavery or human trafficking, and we fully support the promotion of ethical and lawful business practices within our workplace.
- 2.3. We will not tolerate or condone any form of practice that constitutes slavery or human trafficking whatsoever and to this end we shall carry out due diligence and auditing and put in place safe reporting mechanisms.
- 2.4. We will adhere to the Modern Slavery Act 2015 and Ethical Trade Initiative (ETI) guidelines in all areas where people are at potential risk.

3. Our Supply Chain and Labour Force

- 3.1. Our supply chain is an important part of our success and our culture. We expect each of our business partners to conduct their business with the same commitment, and to this end we will assess all suppliers to our business.
- 3.2. The workplace practices that we expect from ourselves, and our suppliers include:
 - 3.2.1. not to use slave labour, illegal child labour or forced labour.
 - 3.2.2. ensuring that the overall terms of employment are voluntary.
 - 3.2.3. following all local applicable laws pertaining to minimum age requirements, wages, overtime, and benefits
 - 3.2.4. following all local applicable laws pertaining to the number of hours worked in a seven (7) day week.
 - 3.2.5. periodically certifying that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery.
- 3.3. Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of the Company. From time to time, we will conduct audits and surveys of our workforce and supply chains to evaluate and address risks of human trafficking and slavery.

4. Relevant Policies

- 4.1.** We actively encourage our employees, suppliers and customers to follow our guidance as set out in our Whistleblowing policy should there be any claim or indication of human trafficking or slave labour.
- 4.2.** Any claim or indication of human trafficking or slave labour will be taken seriously and will be promptly investigated by Human Resources under our Disciplinary Policy and Procedure, and with support of external agencies as and when required.
- 4.3.** If any violation of this policy is found, the Company will take prompt, remedial measures to address the violation.
- 4.4.** We will provide ongoing training and support to our employees should this be necessary for the correct application of this policy.

5. In the Workplace

- 5.1.** The Human Resources team will carry out all necessary checks as set out in our Recruitment Policy, on all staff who apply to work at the Company.
- 5.2.** The Human Resources team will carry out spot checks across the company to ensure that there is full compliance with anti-slavery or human trafficking laws.
- 5.3.** The Human Resources team will regularly monitor the use of external agency resources and audit where necessary.
- 5.4.** The Human Resources team will investigate carefully and sensitively any claims of slavery or human trafficking within the company and advise on the best course of action to take, in accordance with their professional code of conduct.
- 5.5.** The Human Resources team will ensure that managers and decision makers with regards to the use of staffing and resources are adequately informed and trained on this policy to achieve company expectations and standards.
- 5.6.** The Organisation will ensure that any future changes to this policy will be reviewed and agreed by the business and its Management Team.
- 5.7.** This policy will be reviewed on an annual basis and amended in accordance with any changes to the Modern Slavery Act 2015 or Ethical Trading Initiative.



Michael Curtin

COO

Reviewed: Sept 2023