Anti-Slavery and Human Trafficking Policy

The Company opposes slavery and human trafficking in all its forms. We set out the steps taken to ensure that there is no slavery or human trafficking in our business or in our supply chain. We confirm the same in our annual modern slavery statement and follow this Anti-Slavery and Human Trafficking Policy. Our statement is publicly filed with the Modern Slavery Statement Registry here.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. The Company has a zero-tolerance approach to modern slavery and it is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Company is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of our contractors, suppliers and other business partners. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager. If you believe or suspect a breach or conflict of this policy has occurred or that it may occur you must notify your manager as soon as possible.