HUMAN RIGHTS AND MODERN SLAVERY POLICY STATEMENT

We believe business can only flourish in societies where human rights are protected and respected. We recognise that businesses have the responsibility to respect human rights and the ability to contribute to positive human rights impacts. We are committed to protecting the human rights of all our colleagues and of everyone who receives direct or indirect services from us. As a responsible, ethical organisation, we fully support the principles of the Human Rights Act and all associated legislation.

Our Responsibilities

Our responsibility for human rights encompasses:

- Operating Sites — we will uphold the human rights of all employees, visitors and contractors at our premises.
- Supply Chain — it is our aspiration to ensure that working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.
- Clients – We will actively engage with our clients to uphold these standards, and we expect all client sites to provide safe, fair, and respectful workplaces that align with the principles set out in this policy.

References

This policy statement has been developed with reference to the following documents:

- The Human Rights Act 1998
- The Modern Slavery Act 2015
- The UK Ethical Trading Initiative Base Code

Key Principles

- Child Labour - We will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.
- Forced Labour - We will not make use of any forced labour or debt-bondage labour in accordance with the Modern Slavery Act 2015.
- Discrimination - We will not discriminate against any person based on their protected characteristics and will uphold Article 14 of the Human Rights Act 1998 in respect of protection from discrimination.
- Discipline - We will not employ, or allow to be employed, any form of corporate punishment, physical coercion, or verbal abuse. Any disciplinary matter will be dealt with through formal procedures.
- Working Hours - Working time directives will be adhered to as per the Working Time Regulations 1998 with opt-out clauses publicised to staff.
- Remuneration - Wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate.
- Supply Chain Management – We require our suppliers to uphold high ethical standards, ensuring compliance with all relevant legislation and regularly assess their practices to protect workers' rights throughout our supply chain.

Our Policies

We operate a number of policies and procedures which reflect our commitment to acting properly in all of our business relationships and to implementing and enforcing effective systems and controls. They apply to all our employees and to anyone engaged on a temporary basis.

We have policies and procedures which are published and contribute to protecting the human rights of our employees in our organisation and our supply chain. These include the following:

- Harassment and Bullying Policy – designed to help ensure that all of our staff and anyone we interact with is treated with dignity and respect.
- Health & Safety Policy– a key aim of which is to ensure the well-being of all our employees and anyone else who may be affected by our activities.
- HR Procedures – we check that all our staff have the appropriate right-to-work documents and ensure that they are paid fairly and enjoy a competitive remuneration package. We have procedures in place to safeguard the interests of young people and any unpaid work experience volunteers working for the company.
- Agreements - our template agreements and standard terms and conditions require suppliers to comply with the law (including in relation to modern slavery and human trafficking).
- Anti-Bribery & Corruption Policy Manual – which reminds our people to take account of any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption. We operate a zero-tolerance approach to bribery and corruption activities both internally and with its supply chain or client base.
- Whistleblowing Policy – which provides guidance on how to report suspected dangers or wrongdoing in the workplace.

Our policies are monitored by a relevant policy owner within our organisation and reviewed and republished every 12 months. We will continue to review our policies to ensure that they are effective and appropriate.

In particular, our procurement team continues to review and strengthen our centralised procurement processes and policy, taking into account a range of risks, including slavery, human trafficking and human rights.

Our Suppliers

As a business, we operate a Supplier Code of Conduct and maintain a preferred supplier and partner list. We conduct due diligence on all suppliers and partners before allowing them to become a preferred supplier or partner and expect our supply chain to adhere to our published Supplier Code of Conduct.

Core Values

Our Core Values and principles underpin the philosophy of how we operate. We believe everyone should be treated with respect regardless of their background. We are committed to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class.

Training

We regularly conduct training for our teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.



Angelo Di Ventura
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