

1. Status of this policy

This policy sets out the company's policy on combating forced labour in our business and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach.

This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended at any time.

2. Why combating forced labour matters

Forced labour is a global problem. It affects over 20 million people around the world. Taking steps to tackle forced labour protects vulnerable workers and helps prevent human rights violations.

We do not tolerate forced labour within our business. Eradicating forced labour is consistent with our ethical principles and is important to protect our reputation, sustain investor and consumer confidence and secure our commercial position.

3. Our responsibilities

The Board of Directors is responsible overall for ensuring that this policy and our annual slavery and human trafficking statement comply with our legal and ethical duties.

The Human Resource Department has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place in our business or our supply chains.

The Board of Directors is also responsible for preparing the annual statement. The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its business (see web site for Statement).

4. What we are doing

We are confident that we employ no forced labour directly within our business. However, we regularly review that and also assess our supply chain with a view to ensuring that there is no use of forced labour within the supply chain.

We take the following steps to prevent, evaluate and address risks of forced labour in our supply chain:

- We have established a Supplier Code of Conduct as part of our “Ethics of Business – Global Standards for Suppliers” policy with which we expect our suppliers to comply. We may impose contractual obligations requiring compliance;
- We review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we take appropriate steps to address it; and
- We consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.
- We train personnel working with our supply chain on forced labour and the Supplier Code of Conduct, with a view to reducing the risks of forced labour in our supply chain.

5. Employee responsibilities

Managers are responsible for ensuring that this policy is applied within their area of responsibility.

Our employees are expected to be alert to any indicators of forced labour in our business or supply chain.

We do not tolerate any forced labour within our business. If you suspect that there has been a breach of this policy or if you have any concerns regarding the issue of forced labour in any part of our business or our supply chain, you should notify your line manager or report it to a member of the Human Resources Dept as soon as possible.

6. Monitoring our effectiveness

We will review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and if appropriate follow up action has been taken.

Other relevant policies:-

Ethics of Business – Global Standards for Suppliers