Modern Slavery and Human Trafficking Policy



MODERN SLAVERY STATEMENT 2017

The Company acknowledges its responsibilities in relation to the Modern Slavery Act 2015 and fully supports the Government's objective to eradicate modern slavery and human trafficking.

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. We recognise that as a commercial organisation we have a moral and social responsibility to help eliminate modern slavery and human trafficking and prevent it occurring within our business and supply chain. In addition to this we recognise the need to ensure that our suppliers adopt similar business practices to protect vulnerable workers and help prevent and remedy severe human rights violations in the UK and abroad.

EVALUATING OUR PROGRESS

During 2016, we required our major or high-risk suppliers to complete Supplier Questionnaires and Supplier Declarations and encouraged them to adopt the same high ethical standards that we operate to. We began an 'Approved Supplier' list to ensure we only contract with suppliers that meet the required standards.

In 2017 we

- Identified and evaluated the risks of modern slavery and human trafficking within our supply chain, including sources outside the UK and EU, where there is likely to be a higher risk
- Required our suppliers and contractors to complete Supplier Questionnaires and Supplier Declarations and encouraging them to adopt the same high ethical standards to which we operate
- Commenced development of 'Approved Supplier' lists and terminated relationships with suppliers that failed to meet the standards
- Commenced training our employees to identify modern slavery and human trafficking within our supply chain; how to raise issues and take suitable action in order to help eliminate these practices and
- Ensured that there is accountability to all our stakeholders whose lives are affected by our business activities

in our drive to prevent modern slavery in the areas where we have influence.

COMMUNICATION

This policy is communicated to all Company employees through shared data and relevant stakeholders via our Company website. It will be reviewed on a regular basis to ensure it remains compliant with the Modern Slavery Act 2015 and current company strategy.

This statement is made pursuant to section 54(1) of the Act and constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2017.

Mark Silvester CEO



Issue 2.0 Sept 2018