

## **Anti-Slavery and Human Trafficking Policy**

### **1. Introduction**

- I. Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour 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. We have a zero-tolerance approach to modern slavery and we are 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.
- II. We are also committed to doing the right thing and ensuring that there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners.

### **2. Expected Behaviours**

- I. We expect our suppliers and business partners to exhibit the same high standard of behaviours as we expect in our own business. This includes the following:
  - i. **Forced or Involuntary Labour**

Workers shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
  - ii. **Recruitment Fees**

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries. This does not include recovery of training costs from individuals that leave before the end of their probationary period.
  - iii. **Document Retention**

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports) is strictly prohibited. The retention of personal documents shall not be used to bind workers to employment or to restrict their freedom of movement.

- iv. **Contracts of Employment** Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities regarding wages, working hours and other working and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.
- v. **Deposits**  
Migrant workers shall not be required to lodge deposits or security payments at any time.
- vi. **Humane Treatment**  
The workplace shall be free of any form of harsh or inhumane treatment.
- Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour.
- The use or threat of physical or sexual violence, harassment and intimidation against a worker, their family, or close associates, is strictly prohibited.
- vii. **Workplace Equality**  
All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.
- viii. **Wages and benefits**  
All workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure,

or to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

ix. **Working hours**

Workers shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas

x. **Freedom of Movement and Personal Freedom**

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer or recruiter operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

xi. **Grievance Procedure**

An effective grievance procedure shall be established to ensure that any migrant worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

xii. **Private Employment Agencies and Labour Recruiters**

Companies should hire migrant workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, companies shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

**3. Employee Responsibility**

- I. 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.
- II. You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

- III. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or our supply chains at the earliest possible stage. If you are unsure about whether an 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 line manager
- IV. Where appropriate, and with the welfare and safety of local workers as a priority, as part of our responsible procurement approach we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- V. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains

#### 4. Breaches of this Policy

- I. Any employee who knowingly breaches this policy will face action under their local grievance processes.
- II. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signature:



Date: 28/20/2020

Position: Director