

## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Modern slavery is a crime and a 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 are committed to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with disclosure obligations we may have under applicable law. We expect the same standards from our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

### WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### WHO IS RESPONSIBLE FOR THIS POLICY?

The Managing Partner has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Partner has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

This policy will be reviewed regularly and we may amend it at any time to update with best practices and processes.

## Modern Slavery Policy

HR Officer Page 3 of 4 Revision due by: July 2024

### YOUR COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand and comply with this policy

Preventing, detecting, and reporting modern slavery in any part of our business or supply chains is the responsibility of 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.

### HOW AND WHEN TO NOTIFY IN CASE OF NON-COMPLIANCE

If you believe or suspect that a breach of this policy has occurred, or may occur in the future, you must inform HR Manger or HR officer as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

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 the HR Manager or HR Officer.

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 own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the the HR Manager or HR Officer immediately.

#### COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery, forms part of the regular training for our employees.

Our commitment to addressing issues of modern slavery in our business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### BREACHES OF THIS POLICY

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.