



ANTI-SLAVERY POLICY



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Introduction

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 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. Although we are not legally obliged to report on slavery and human trafficking, this statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and is our slavery and human trafficking statement for the financial year ending 30 November 2025.

Organisational structure, business and 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 our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of 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, and we expect that our suppliers will hold their own suppliers to the same high standards.

Policy on slavery and human trafficking

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. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains. We ensure that all suppliers we use are made aware of our policy and comply with equally high standards.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Due diligence

We consider ourselves to be a 'low risk' business with regard to slavery and human trafficking. However, we foster a culture that encourages the identification and reporting of any such risks within our business. We recruit all our employees either directly or through



recruitment agencies who are members of the Recruitment and Employment Confederation. We do not recruit from outside the UK or use agency workers.

Assessing and managing risk

As a business we regularly evaluate the level and nature of any risks of modern slavery or exploitation, in both our own practices and those of our supply chain. We have a whistleblowing policy in place and, as part of our efforts to identify and mitigate risks within our supply chain, we are introducing systems to identify, assess and monitor potential risk areas.

Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Issued by: David McGuffie

Signed: 

Position: Director

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