

Modern Slavery Act

Introduction

The Modern Slavery Act (“Act”) received Royal Assent in 2015, and essentially requires large commercial organisations to confirm the actions they have taken to detect and deal with forced labour and trafficking in their supply chains. The intention of the Act is to provide greater protection against enforced labour and instilling more effective tools for law enforcement.

This is the Group’s first annual statement and we have looked to set out our approach to the Act, including the steps we are taking to protect potential victims of modern slavery; with the aim to prevent and eradicate modern slavery in our business and supply chains.

Our approach has involved:

- Ensuring that key internal departments of HR, compliance, IT etc. all work collaboratively in order to ensure good practice under the Act
- Identifying where risks of modern slavery may exist and reviewing relevant processes
- Conducted a review of relevant policies as well as supply chains in order to ensure they meet the requirements of the Act

Employees

Our HR department has processes in place to ensure all employees that are recruited meet the 1998 Immigration Act requirements, as well as relevant background checks.

We have taken steps to review our supply chains in order to ensure that our management teams have an understanding of what modern slavery is, and how to identify and address it within the supply chain.

Customers

Our relationship with Customers is governed by anti-money laundering and financial crime procedures in order to ensure that risks are sufficiently addressed. Accordingly, such processes help us to assess and manage risks and we conduct due diligence on relevant customers and transactions, where deemed appropriate.

We recognise that the obligations under the Act are an ongoing process and, as we continue to grow and evolve as a Group, we will look to further review our processes in accordance with relevant internal input as well as any feedback from external stakeholders about our approach.

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