

## **MODERN SLAVERY ACT 2015 – ANNUAL STATEMENT 2020**

### **INTRODUCTION**

This annual statement is made in conjunction with the Company Modern Slavery Policy and should be read in conjunction with said policy.

This statement issued under the Modern Slavery Act 2015 outlines the steps we have taken as a business to identify and prevent slavery and human trafficking in our own operations and supply chains. We understand our responsibilities and are committed to improving our practices to combat slavery and human trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls

The Company Whistleblowing Policy provides a system for our employees to escalate slavery and human trafficking issues and breaches of our Group policies. All policies are reviewed annually. There have been no breaches or suspected breaches of our Anti-Slavery and Human Trafficking Policy reported in 2020.

### **DUE DILIGENCE FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify, monitor and mitigate against business risk, we nominate the Head of HR and Compliance as the senior representative of the business, who in turn reports to the Managing Director. We have in place policies and systems across our business and operations to:

- Identify inappropriate employment practices
- Identify, assess and monitor other potential risk areas
- Protect whistleblowers
- Investigate reports of Modern Slavery

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have a Business Code of Conduct which outlines our expectations. The Code of Conduct lists what we expect of Suppliers and the standards expected. The Group Purchasing Manager monitors and enforces compliance of the Code of Conduct in terms of our suppliers.

We operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant country of operations.

### **ACTIONS TAKEN 2020**

- All staff working in procurement and HR have completed training on modern slavery

- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain
- Reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.
- As well as training specific staff, the organisation has raised awareness of modern slavery issues by utilising the Stronger Together portfolio of resources across the organisation's premises.
- All new employees complete modern slavery training as part of their induction programme, and questionnaires are completed.

## **COVID-19**

We understand that some workers may be more vulnerable to modern slavery during the coronavirus pandemic. The Group adopted government guidelines for COVID 19 secure workplaces, and has many measures in place in terms of safety and payment of staff that may self-isolate in order to prevent the spread of coronavirus. Our employees have been and continue to have access to our grievance procedures.

## **NEXT STEPS 2021**

- Further raise awareness of the Anti-Slavery and Human Trafficking Policy and Code of Conduct with our employees and suppliers.
- Additional training for employees as necessary.
- Continue to develop the system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain.

## **STATEMENT**

This statement constitutes our Group's slavery and human trafficking statement for 2021 and is approved by the Board of Directors.

*Ray McSorley*

Managing Director  
27 October 2020