

# Slavery and human trafficking

## Commitment

- The Group has a zero-tolerance approach to all forms of modern slavery and is committed to acting ethically and with integrity in all its activities.
- We have implemented and enforce measures and controls to ensure modern slavery is not taking place within our business.
- We are committed to achieving transparency in our approach to tackling modern slavery in our supply chains, in accordance with our obligations under international legislation such as the UK Modern Slavery Act 2015 and the USA Trafficking Victims Protection Act: 22 U.S.C. § 7101.

## Responsibility

- The Group managing director is responsible for the effective implementation and maintenance of the policy.
- The Group business management systems and risk director is responsible for implementing this policy, monitoring its use and effectiveness, and for auditing the control systems embedded in our business management systems.
- General managers ensure we meet our obligations on a day-to-day basis and are responsible for monitoring and implementing this policy.

## Approach

### Clients

- We seek to work with clients around the world who share our commitment to meeting the principles of national legislation and associated International Labour Organisation (ILO) regulations.

### Contractors, suppliers and business partners

- We require our contractors, suppliers and business partners to have standards and policies that govern their business and meet their obligations under the national legislation and associated ILO regulations.
- We undertake appropriate due diligence in evaluating contractors, suppliers and business partners before formalising relationships with them.
- Our arrangements with contractors, suppliers and business partners allow us to withdraw from contracts in the event that breaches of their commitments or unethical business practices become apparent.

### Employees

- We seek to have a culture of mutual respect among all employees, with equal opportunities promoting fair employment, considering local culture and laws.
- We are committed to paying at least the local national living wage to employees and expect our contractors, suppliers and business partners to do the same.

### Public interest disclosure

- We encourage staff to raise concerns without fear of reprisal and provide a number of communications channels for this purpose, including the confidential and independently-managed 'Speak Up' service.



Keith Howells  
Chairman