



## Modern Slavery Policy

### Purpose

The purpose of this Modern Slavery Policy is to ensure that our business and supply chains are free from modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships.

### Scope

This policy applies to all employees, officers, directors, contractors, suppliers, and any third parties acting on behalf of the company, regardless of location.

### Policy Statement

We have zero tolerance for modern slavery and human trafficking. We are committed to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### Definitions

- Modern Slavery: Encompasses slavery, servitude, human trafficking, and forced labour. Individuals are coerced to work against their will through violence, threats, or other forms of coercion.
- Human Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons, by means of threat or use of force or other forms of coercion, for the purpose of exploitation.

### Standards and Procedures

#### Due Diligence

- Supplier Screening: Conduct thorough due diligence when engaging new suppliers, including assessments of their policies and practices related to modern slavery and human trafficking.
- Risk Assessment: Identify and assess potential risk areas in our supply chains and take appropriate steps to mitigate any identified risks.

#### Contracts and Agreements

- Supplier Contracts: Include specific clauses in supplier contracts that require compliance with this policy and applicable laws regarding modern slavery and human trafficking.
- Termination: Reserve the right to terminate any business relationship with suppliers who fail to comply with this policy or who are found to be involved in modern slavery.



#### Reporting and Whistleblowing

- Reporting Mechanism: Establish and maintain clear procedures for reporting suspected instances of modern slavery or human trafficking. Employees should report any concerns to their line manager or through the company's whistleblowing hotline.
- Protection: Ensure that whistleblowers are protected from retaliation, and that reports are treated confidentially and investigated promptly.

#### Training and Awareness

- Employee Training: Provide regular training to employees on modern slavery and human trafficking, including how to identify and report concerns.
- Supplier Awareness: Communicate our commitment to combating modern slavery to all suppliers and third parties and provide them with a copy of this policy.

#### Monitoring and Review

- Audits: Conduct regular audits and assessments of our supply chains to ensure compliance with this policy.
- Performance Metrics: Develop and monitor key performance indicators (KPIs) to measure the effectiveness of our efforts to combat modern slavery.
- Continuous Improvement: Review and update this policy periodically to reflect changes in laws, regulations, and best practices.

#### Responsibilities

##### Management

- Provide leadership and resources to implement and enforce the Modern Slavery Policy.
- Ensure that all employees and associated persons understand and comply with this policy.

##### Employees

- Comply with the Modern Slavery Policy and all related policies and procedures.
- Report any suspected incidents of modern slavery or human trafficking promptly.

##### Compliance Officer

- Develop, implement, and maintain the Modern Slavery Policy and related training programs.
- Monitor compliance and conduct regular risk assessments and audits.

#### Consequences of Non-Compliance


- Any employee or associated person found to be in violation of this policy will be subject to disciplinary action, which may include termination of employment or contract.



- Legal action may be taken against individuals or entities involved in modern slavery, including reporting to relevant authorities.

Approval

This policy is approved by the CEO.

Signature: A handwritten signature in black ink, appearing to read "S. WINE", is written over the word "Signature:".

Date: 01/01/24

Effective Date: 01/01/24

Next Review Date: 31/12/24

By adhering to this Modern Slavery Policy, we commit to maintaining the highest ethical standards, protecting the rights and dignity of individuals, and contributing to the global efforts to eradicate modern slavery and human trafficking.