

Form Title: Modern Slavery Policy
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MODERN SLAVERY POLICY

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that the company has taken and is continuing to take to ensure that modern slavery of human trafficking is not taking place within our business or supply chain. Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. The company has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Policy aims:

- The company is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.
- The company's directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness.
- Acknowledge responsibility to the Modern Slavery Act 2015 and ensure transparency within the organisation and with suppliers of goods and services to the organisation.
- We will not support or deal with any business knowingly involved in slavery or human trafficking. We will carry out due diligence of potential and existing suppliers and we will take steps where such practices are identified.
- Operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Confidential Reporting (CIRAS). We operate a confidential reporting scheme so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our Suppliers

The company maintains a Supplier Management Procedure and Approved Supplier List. We conduct due diligence on all suppliers before allowing them to become an approved supplier. We require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- call upon all organisations it engages with to influence their global supply chains by improving transparency and accountability. The company believes that together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Training

We regularly brief all relevant management and staff members, and ensure that our policies reach every employee, in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We achieve a level of communication and personal contact with every employee and their understanding of, and compliance with, our expectations regarding modern slavery.

The Managing Director shall review this policy annually or following significant changes.

Signed: *David McHugh*

Name: D. McHugh

Role: Managing Director

Date: June 2026