

standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supply chain code of conduct: The Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Group works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Group's supplier code of conduct will lead to the termination of the business relationship.

- Recruitment/Agency workers' policy: The Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- Any other policies relevant to the Group's business or sector: The Group has other relevant policies such as Corporate Social Responsibility Policy, Young Persons Policy, Equality and Diversity Policy and Ethical Policy. The Modern Slavery Policy must be woven into the fabric of all these other relevant policy, in that they are all to be interpreted within the spirit and intent of this policy. Where there is any inconsistencies or ambiguity between this policy and any other, this policy will prevail.

Due diligence

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group's due diligence and reviews include;

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through [third party auditor] and requiring them to implement action;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- Where available, using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.
- At least one comprehensive annual audit of The Group's supply chain with quarterly ad hoc physical and document spot checks of the workforce to ensure ongoing compliance.