

## PURPOSE

To ensure that employees are aware of the challenges and controls required to ensure we do not now knowingly undertake or participate in any form of modern day slavery.

## SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

Stonbury Group (the "Company") acknowledges the provisions of the Modern Slavery Act 2015 and will ensure transparency within its organisation and with suppliers of goods and services to the organisation. The Company is satisfied from its own due diligence there is no evidence of any act of modern day slavery or human trafficking within its own organisation. As part of the Company's due diligence processes into slavery and human trafficking the supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk of slavery and human trafficking issues. The level of management control required for these sources will be continually monitored. The Company will not knowingly support or deal with any business involved in slavery or human trafficking. The Company will undertake responsibility for implementing this Policy Statement and its objectives. This Policy Statement will be reviewed annually by the board of directors.

## APPROVAL

Signed by the Director of People and Culture



Loraine Thomas  
Date 02/07/2022

*To be reviewed annually or in the event changes to legislation, organisational changes or failures to the system being highlighted.*