

## PURPOSE

To ensure that Stonbury does not knowingly undertake or participate in any form of modern-day slavery and to mitigate the risk of it occurring in within our business or our supply chain.

## 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.

## RISK BASED APPROACH

To maximise our effectiveness, we use a risk-based approach and focus on the areas of highest risk whilst remaining cognisant of our size, scope and operational reach.

## POLICY

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 mitigate the risk that 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.

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:

- Modern Slavery in any of its forms
- Human trafficking
- Child labour

The company strictly forbids the following behaviour within its business or those working on Stonbury's behalf:

- Worker-paid recruitment fees
- Withholding or confiscation of original identification documents
- Restriction of movement
- Any threat of violence, harassment and/or intimidation

## EMPLOYEES

Stonbury employees are an essential part of the fight against injustice and to this end Stonbury will take steps to ensure all employees continue to be aware of this issue and are armed with knowledge of the common warning signs and the action they should take.

## SUSPECTED OCCURANCE

Should an employee have a concern that someone is at risk of Modern Slavery the most important issue is that it is reported promptly, there are several routes it can be reported:

- To line manager / supervisor or any senior manager
- In confidence to People & Culture
- If they would prefer, for whatever reason, an employee can report the incident direct:
  - Police 999 (emergency) - Police 101 (not emergency)
  - Modern Slavery Helpline: 08000 121 700
  - Gangmasters & Labour Abuse Authority (GLAA): 0800 432 0804 (Confidential)

## MANAGEMENT ACTION

Should a member of management become aware of possible breach, it is their responsibility to report to board level and ensure that the relevant authorities are informed without undue delay.

Each occurrence is likely to be different and the first steps are to gather information and be guided by experts. There is no requirement to automatically remove contractors from site, as such action could put the victims at risk or inhibit support.

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 31/10/2023

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