



POLICY 015:

Modern Slavery and

Human Trafficking

Issue: 02-09-2024

v2.3

Contents

| | | |
|---|--|---|
| 1 | Introduction | 3 |
| 2 | Policy Statement | 3 |
| 3 | Proliferation..... | 4 |
| 4 | Scope | 4 |
| 5 | Responsibility | 4 |
| 6 | Supply chains | 4 |
| 7 | Supporting Policies and Procedures | 5 |
| 8 | Performance Indicators | 5 |

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1 Introduction

This statement is made on behalf of Veriflo Limited pursuant to section 54(1) Modern Slavery Act 2015. The Company will meet the requirements of all relevant UK, EC & EEC Legislation & Directives relating to the human rights of its workforce and business practices. Veriflo will work to ensure that modern slavery and compulsory labour have no place within our operations, as defined in the Modern Slavery Act 2015.

This policy also formalises the Company's guidance and instruction to personnel on understanding their responsibilities and the systems implemented to maintain integrity in our operations and ensure that human trafficking and modern slavery are not taking place within our supply chain.

2 Policy Statement

Modern slavery is a serious crime and a violation of fundamental human rights. It takes different 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 to exploit them for personal or commercial gain.

This Company is absolutely opposed to modern slavery and committed to ethical operation, with integrity and transparency in all our business relationships and as such, shall implement effective systems to confirm modern slavery is not taking place anywhere in our own business or in our supply chain.

The Company expects the same diligence from other business partners, and we will carry out a due diligence exercise prior to establishing any contractor, supplier, or other business relationship in order to be satisfied there is no evidence of modern slavery. The Company will not knowingly deal with any businesses involved in slavery or human trafficking. Likewise, we expect the organisations that we deal with will also provide evidence of their compliance to the Act and to our code of conduct by agreeing to the following statement:

"The contractor/supplier/business partner warrants that it has thoroughly investigated its labour practices and those of its direct suppliers to ensure that there is no slavery or forced labour used anywhere in its organisation or used in any of its direct suppliers' or sub contractors' organisations. The contractor/supplier/business partner further warrants that it has put in place all necessary processes, procedures, investigations and and compliance systems to ensure that the warranties made above will continue to be the case, at all times."

The Company PQQ contains the condensed statement: *"Company warrants that it has investigated its labour practices and those of its direct suppliers and affirms that they are free of the signs of slavery or forced labour and has implemented compliance systems to ensure this will be maintained"*.

If any suggestion or evidence is provided which indicates potential Modern Slavery within our supply chain, it will be taken seriously. Trading with relevant entities may be suspended if the evidence is compelling, and appropriate legal action will be investigated. Internal investigation into the circumstances which allowed the

situation to arise will be instigated, and if a more robust screening process is recommended, systems will be put in place to achieve such.

3 Proliferation

The Company shall proliferate this policy through our online portal to all clients and suppliers to ensure as far as practicable that all aspects of the company supply chain are trading ethically and without the damaging impacts of Modern Slavery or Human Trafficking. The Company shall;

- Liaise with suppliers and contractors to verify their acceptance of the policy guiding principles
- Review the implementation of this policy internally
- Review and update the content of this policy annually for continual improvement

Proper implementation and application of this Policy by all employees is paramount, this policy must be reviewed and accepted by all personnel. All employees are required to comply with the terms of this Policy and any related arrangements or supporting policies as required.

4 Scope

This Policy applies to all employees and subcontractors completing work on behalf of the Company. It covers the work that we do directly and any persons who may be affected by our activities. This policy shall be proliferated to all entities who are involved with our working process, and will be reviewed annually, or sooner where necessity arises.

5 Responsibility

The overall responsibility for ensuring this policy complies with our legal and ethical obligations rests with the Executive Directors. Compliance personnel shall be responsible for reviewing internal systems and procedures and monitoring their use and effectiveness. The management team have day-to-day responsibility for the implementation of this policy, dealing with any queries ensuring those reporting to them understand and comply with the policy and are given suitable information on the issues of modern slavery.

6 Supply chains

The Company acknowledges the risk that a supply chain may involve the use of a hidden or unknown forced labour. However, the Company considers the risk of modern slavery to be low due to the limited and relatively static nature of its supply chains. The Company takes the responsibility to combat modern slavery seriously. The Company has implemented the Supply Chain Assurance procedure (PROC 012) to underpin its efforts to verify and control subcontractor and supplier standards.

To this end, the Company operates a subcontractor prequalification procedure and maintains an approved supplier list. Due diligence checks are performed on all suppliers before allowing them to become an approved supplier, requiring that they confirm that they have taken steps to eradicate modern slavery within their business and hold their own suppliers to account over modern slavery.

- All supply chains are risk assessed in relation to modern slavery
- Any organisations found to be high-risk will be subject to further investigation, with trading potentially suspended proportionate to the level of risk identified

- The Company encourages anyone to raise concerns about modern slavery
- The Company will obtain assurances from suppliers that they are free of modern slavery.
- The Company requires that all approved suppliers provide evidence of policies or processes in place in to reduce the risk of modern slavery, or request agreement with our own Policy and declaration.
- During recruitment, employees will be made aware of the Company's commitment to anti-slavery & anti-trafficking – and the Company shall seek confidence that work is being undertaken through free will.

7 Supporting Policies and Procedures

In support this Policy, the Company has implemented the Responsible Procurement Procedure to define and uphold ethical practices in procurement. This expands upon the foundations set out in this Policy and encompasses the following principles, expected from all suppliers, subcontractors and other persons doing business with us;

- Employment is freely chosen
- Freedom of Association and right to collective bargaining are respected
- Working Conditions are Safe and Hygienic
- Child labour shall not be used
- Living Wages are paid
- Working Hours are not excessive
- No discrimination is practiced or tolerated
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- An Anti-Slavery Policy exists to underpin these initiatives
- Robust recruitment procedure
- Anti-Corruption and Whistleblowing procedures are available to support ethical business

Additionally, POL 004 Corporate Social Responsibility Policy supports these critical requirements, and works to encourage business practices which move beyond legal and ethical imperatives with initiatives to support positive business cultures and create partnerships to provide a net benefit to the communities and ecologies in which we operate.

8 Performance Indicators

The Company shall assess the effectiveness of the steps being taken to ensure that slavery and/or human trafficking is not taking place within our supply chain such that:

- No reports are received from personnel, 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 team member and their understanding of, and compliance with, our expectations regarding modern slavery.

9 Associated Documents

Documents associated with this policy include:

- PROC 012 Supply Chain Assurance
- POL 004 Corporate Social Responsibility