

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2017

Updated August 2020

The Agnew Group believes it is our responsibility to uphold the highest standards of ethical behaviour and personal integrity within our business operations. Wherever we do business, our employees are required to comply with all applicable laws, rules, and regulations.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. 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 the personal or commercial gain of another. Modern Slavery is a criminal offence.

1. PURPOSE OF THIS POLICY

- 1.1 The Modern Slavery Act 2015 was introduced with the aim of eradicating slavery and human trafficking. The Act also contains a number of measures intended to encourage businesses to take steps to address modern slavery.
- 1.2 In support of our aims to be the Best Company to do business with and work for, the Agnew Group has implemented strong governance measures whilst enabling businesses to be entrepreneurial within a framework of strong control.
- 1.3 We adopt a firm attitude to Modern Slavery and Human Trafficking. We are committed to eradicating it in all areas of our business operations and we expect the same standards from all those who work with us, whether they are employees, representatives or business partners or suppliers.
- 1.4 The purpose of this policy is to provide information and guidance to all persons working for the Agnew Group in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Modern Slavery Act 2015.
- 1.5 The policy applies to all persons working for any part of the Agnew Group or on behalf in any capacity and within any part of our business. It applies to employees at all levels, including directors and agency workers and to our supply chain including all sub-contractors, consultants, service providers and any other agents, third-party representatives and business partners.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 The Agnew Group has a zero-tolerance approach to modern slavery, and is fully committed to preventing slavery and human trafficking in our operation and supply chain. As a company we are committed to protecting our organisation and those people at risk from exposure to

slavery or human trafficking, both via our direct employees and those working on behalf via third party vendors.

2.2 The Agnew Group has conducted a risk assessment on our business to assess the risk of modern slavery and human trafficking. Based upon the results of this assessment and as part of our initiative to identify and mitigate risk, we have undertaken the following actions:

- Built the assessment of slavery and modern trafficking risk into our supplier sourcing and due diligence process. Before a new supplier, contractor or service provider is approved the Agnew Group carry out appropriate due diligence on that supplier, including requiring them to complete a questionnaire on their own modern slavery policies. As part of this process the Agnew Group will review any supplier's policies as well as provide them with a copy of the Agnew Group policy on modern slavery and human trafficking. New suppliers will only become approved suppliers once the Agnew Group has completed its due diligence.
- The review and assessment of existing suppliers in relation to their modern slavery policy and then conducting due diligence as outlined above on those who currently supply a service to our business.
- Establishing a due diligence process around conducting business with external providers who will be formally audited on an annual basis to ensure that their sites are adhering to the process.
- Requiring third party suppliers and contractors to sign to say that whilst carrying out their obligations to the Agnew Group they shall comply, and seek to ensure that each of their own subcontractors and suppliers involved in the provision of goods and services, comply with the Agnew Group Modern Slavery Act Code of Conduct.
- The development and implementation of training to our Management Teams to identify, assess, mitigate and report specifically on modern slavery.
- The development and communication of our modern slavery policy to our employees and those who we conduct business with.
- To ensure that the Agnew Group confidential employee reporting line is clearly promoted in all our sites to encourage the reporting of modern slavery concerns.

3. RESPONSIBILITY FOR THE POLICY

3.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

4.1 The Company has an "open door" policy which provides employees with the freedom to approach any member of management with ethical questions or concerns without fear of retaliation.

4.2 We also have an established confidential hotline for any concerns you are uncomfortable sharing with local management. All employee communications made in good faith (even if genuinely made by mistake) will be treated promptly and professionally and without any risk of retribution. The line may be accessed by employees or any other person wishing to raise a concern. The number to call is:

Expolink Confidential Line: 0800 374 199

5. SAFEGUARDS

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting any suspicion they might have with regards to Modern Slavery. If an employee considers that they have suffered any such treatment, then they should inform the Personnel director immediately. Alternatively, they can raise a grievance.

6. COMPLIANCE

- 6.1 You must ensure that you read, understand and comply with this policy.
- 6.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 6.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.
- 6.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it via our confidential reporting line as soon as possible.
- 6.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 6.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a

concern. If you believe that you have suffered any such treatment, you should inform your Personnel Director.

The Group has a Zero Tolerance approach to Modern Slavery and Human Trafficking in any form.

7. BREACHES OF THE POLICY

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 We may terminate our relationship with other third party individuals and organisations working on our behalf if they breach this policy.

8. SUPPLY CHAIN AND THIRD PARTY COMPLIANCE WITH THIS POLICY

Those who are accessing this policy because they are either seeking to have or already have a business relationship with the Agnew Group are also advised to familiarise themselves with this Policy and should refer any questions or comments to the Personnel Department by email: Personnel@agnews.co.uk

9. REVIEW

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis and may be amended from time to time.

12th June, 2017 KD/DC