

MODERN SLAVERY POLICY

Introduction

One of the Company's core values is to uphold sound, responsible and fair business operations. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we are taking to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain.

The Company therefore has a zero tolerance approach to modern slavery.

Purpose and Scope

This policy sets out the Company's position on any form of slavery or human trafficking and provides guidelines aimed at:

1. Ensuring compliance with the Modern Slavery Act 2015.
2. Enabling Directors, employees and persons associated with the Company to understand risks associated with inappropriate and unlawful conduct and to enable and encourage them to be vigilant and to effectively recognise, prevent, avoid and report any wrongdoing, whether by themselves or others.
3. Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
4. Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of slavery or human trafficking.

This policy applies to all Directors, permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, agency workers, casual workers, contractors, consultants, agents, suppliers and sponsors ('associated persons').

The Board of Directors have overall responsibility for ensuring this policy complies with the Company's legal obligations, and all Directors, Employees and associated persons are expected to adhere to the principles set out in this Policy.

Policy

All Directors, Employees and associated persons are required to:

1. Comply with the Modern Slavery Act that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.

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2. Act honestly, responsibly and with integrity.
3. Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

As part of the companies due diligence process into slavery and human trafficking the supplier and sub-contractor approval process will incorporate a review of their controls.

All our existing suppliers / contractors will be requested to show how they are complying with the Act.

Responsibilities and Reporting Procedure

It is the contractual duty and responsibility of all Directors, Employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected slavery or human trafficking in accordance with the procedure set out in the Company's Public Interest Disclosure Policy.

The duty to prevent, detect and report any incident of slavery or human trafficking rests not only with the Directors of the Company but applies equally to all employees and associated persons.

The Company encourages all Directors, Employees and associated persons to be vigilant and to report any inappropriate conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously.

In the event that you wish to report an instance or suspected instance of slavery or human trafficking, you should follow the steps set out in the Company's Public Interest Disclosure Policy. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Company is committed to taking appropriate action against slavery and human trafficking or other unethical conduct. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

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All associated persons must ensure that any contract or agreement entered into by them for or on behalf of the Company contains an appropriate clause aimed at ensuring that any third party to the contract is aware of and agrees to adhere to the contents of this Policy and further, that the contract expressly sets out the consequences of non-compliance including, where appropriate, clear provision for terminating the contract in the event of non-compliance.

Monitoring Compliance

The Company's QESH coordinator has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Directors of the Company.

Training

The Company will provide any necessary training to all Directors and employees to help them understand their duties and responsibilities under this Policy and the Act.

Signed on behalf of the Board of Directors



Ian Jones

Managing Director

21/2/2018

