

# UK Modern Slavery Act 2015

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## Document Control Sheet and Version History

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1.0	Name: Patricia Rogers Role: HR Manager Date: 03/10/2024	Name: Simon Blair Role: COO Date: 04/10/2024

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## 1. Policy 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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2. Commitment

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015, the ILO (International Labour Organisation) and the UN (United Nations) guiding principles.

## 3. Suppliers/Contractors/Business Partners

We expect the same high standards from all our contractors, suppliers and other business partners, and 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, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

D2 Global conducts due diligence on all new suppliers through a pre-qualification process. All suppliers are asked to provide a modern slavery policy and details of procedures they have in place to manage modern slavery risks. If we are made aware of any allegations of human trafficking/slavery activities against any of our suppliers, then we would act immediately against the supplier and report it to the authorities.

## 4. Awareness

D2 Global have raised awareness of modern slavery by issuing posters across our offices and briefing our employees on the following:

- Our commitment in the fight against modern slavery and raising awareness.
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

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, interns, 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.

## 5. Responsibilities

The CEO has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it, and has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to line managers.

## 6. Compliance

All employees must ensure they have read, understood, and comply with this policy.

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. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. To report an instance of modern day slavery, employees can speak to their line managers or call the Modern Slavery Helpline on 0800 0121 700.

Employees must notify their line managers as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future

## 7. Review of Policy & Procedures

This policy along with corresponding procedures will be reviewed at regularly intervals for its effectiveness and compliance will be monitored through regular audits of the company's activities.