

# **Modern Slavery Policy**

## **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. Mathewson and Rosemond have a zero-tolerance approach to modern slavery therefore we are committed to acting ethically along with integrity in all our business dealings and relationships. We will endeavour to implement and enforce effective systems that ensure 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 our customers, suppliers, and other business partners. As part of our business engagement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

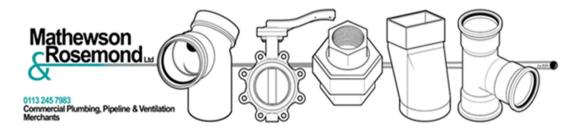
This policy applies to all persons working for Mathewson and Rosemond or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

# **Responsibility for the Policy**

- The Purchasing and HR Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Group Purchasing Director has primary and day-to-day responsibility for understanding and 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 any required training.

### **Compliance with the Policy**

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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. You must notify your manager OR the Procurement Department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

- You are encouraged to raise concerns about any issue of suspicion of modern slavery in any area of our business or the supply chains of any supplier tier at the earliest possible stage.
- 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 in accordance with our Whistleblowing Policy as soon as possible.
- 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the Procurement Department.
- 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, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any area of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

#### **Communication and Awareness of Policy**

- Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.
- Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **Breaches Of This Policy**

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

## **Modern Slavery Act 2015**

Under the 2015 UK Modern Slavery Act, all businesses with over £36m in annual turnover conducting business in the UK are required to publish a slavery and human trafficking statement. The statement should detail the steps that your organisation is undertaking to ensure that your global supply chain is slavery free.