



## **ANTI-SLAVERY AND HUMAN TRAFFICKING**

### **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 zero- tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealing 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.

We are also committed to ensure 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. We expect the same high standards from all of 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 standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels,

- . Directors
- . Apprentices
- . Contractors
- . Third-Party Representatives
- . 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 Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.



## **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 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 or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

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 compliance officer.

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 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 concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using Grievance Procedure.

## **COMMUNICATIONS AND AWARENESS OF THIS POLICY**

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 of gross misconduct.

## **APPROVING STATEMENT**



The Modern Slavery ACT requires a slavery and human trafficking statement to be approved and signed by appropriate senior person in the business; this ensures senior level accountability, leadership and responsibility for modern slavery and gives it the serious attention it deserves.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

EP INDUSTRIES LTD ARE COMMITTED TO ENSURE THAT THERE IS NO MODERN SLAVERY OR HUMAN TRAFFICKING IN ANY PART OF OUR BUSINESS AND IN SO FAR AS POSSIBLE TO REQUIRING OUR SUPPLIERS HOLD SIMILAR ETHOS. EP INDUSTRIES EVALUATED APPROPRIATE POTENTIAL SUPPLIERS BEFORE THEY ENTER THE SUPPLY CHAIN REVIEWING ITS EXISTING SUPPLY CHAIN PERIODICALLY.

**Signed:**

A handwritten signature in black ink, appearing to be 'Edwin Pilsworth', written over a horizontal line.

**Position:**

Managing Director (Edwin Pilsworth)

**Date:**

April 2024

## **THE SLAVERY AND HUMAN TRAFFICKING IN SUPPLY CHAINS THE MODERN SLAVERY ACT 2015**

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>