

Modern Slavery POLICY

Policy: GRC002 – Modern Slavery

Owner: Central Finance

Version: GRC002

Published Date: 16/06/2023.

Next review: 15/06/2025



Contents

Section	Details	Page
1	Policy Statement	1
2	Purpose	1
3	Objectives	1
4	What is Modern Slavery and Human Trafficking	2
5	Concerns to raise	2
6	Confidentiality and protection of employees	3
7	Breach of policy	3
8	Reviews and updates	3
9	Associated policies	3
10	Relevant legislation	3
	Document control	4
	Appendix 1: Policy responsibilities	5



1. Policy Statement

The Delamode Group are committed to the highest standards of ethical business behaviour and treatment of the people that work for us and with us. Delamode Group have a zero-tolerance approach to modern slavery and seek integrity and transparency in all our business dealings and relationships to address any modern slavery throughout our supply chain.

Modern slavery is determined by the Modern Slavery Act 2015 and is both a crime and a violation of fundamental human rights. It can be evident in various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these are forms of exploitation of people for personal or commercial gain and involves the deprivation of liberty for those purposes.

Delamode require and have implementation and enforcement of effective systems and controls to ensure modern slavery is not taking place anywhere in our own business nor in any of our supply chains. Delamode have a detailed statement setting out our commitment and actions in relation to modern slavery and this is available online at https://www.delamode-group.com/wp-content/uploads/2018/09/Delamode_modern-slavery-statement-2018.pdf

We expect the same high standards from all our contractors, suppliers and other business partners: as part of our contracting processes, we include a commitment and 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.

This Policy supersedes previous policies and practices and local site arrangements. It does not form part of an employee's contract of employment and will be amended from time to time. If there is any discrepancy with this Policy and legislation, the legislation will prevail.

2. Purpose

The purpose of the **Modern Slavery Policy** is to:

- **clarify** who this Policy applies to
- **explain** what Employees (in the broadest sense) are required to do.
- Give people the confidence to report any genuine concerns regarding wrongdoing without fear of reprisal, criticism, or discrimination.

3. Objectives

The Policy objectives are to:

- **raise awareness** of modern slavery and human trafficking to help those it applies to recognise any circumstances or situations for concern in the workplace.



- **encourage** an open and protected environment for concerns to be raised, investigated, and properly addressed, without fear of reprisal, criticism or discrimination.
- **give assurance** of Delamode's commitment and support for sharing genuine concerns at an early stage, confidentially, and without fear of victimisation

By promoting and supporting this Policy, Delamode wishes to set out its expectations for people working for us and all our contractors, suppliers and other business partners.

4. What is Modern Slavery and Human Trafficking?

Modern slavery includes slavery, servitude, forced and compulsory labour, bonded and child labour. Victims are coerced, deceived and forced against their free will into providing work or services.

Human Trafficking is where a person arranges or facilitates travel of another person with a view to that person being exploited.

Some examples are provided below to give you some context:

- Individuals are forced to work through mental or physical threat.
- Individuals who have been dehumanised, treated as a commodity or bought/sold as property.
- Individuals who are physically constrained or have constraints or restrictions placed on their freedom.

5. Concerns to raise.

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.

All people covered by this Policy must in accordance with the reporting procedure below notify your line or HR manager or report via the Whistleblowing process of any legitimate concerns or suspicions of modern slavery or human trafficking in any part of our business or supply chain (of any supplier) at the earliest possible stage if you believe or suspect a situation or event has occurred, or is likely to occur, that would not comply with this Policy, and the Policy Statement.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you believe, suspect, or 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, or that it may occur, you must report your concerns as soon as you become aware.

Every report will be treated seriously and will be fully investigated.



Reporting

As soon as possible a person that this Policy applies to must:

- report their concern through their Line Manager or HR Manager, if it is appropriate to do so and they feel comfortable; or
- report it in accordance with our Whistleblowing Policy – which is reporting the concern to the Whistleblowing Officer directly. This can be from the outset or after speaking to their Line Manager or HR Manager.

6. Confidentiality and protection of Employees.

Delamode Group 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 a concern.

Any attempt by anyone within Delamode Group to deter, threaten or seek to bribe an Employee to prevent or discourage them from making a report, or any victimisation of an Employee because they have made a report, will be treated as a serious disciplinary offence and may lead to dismissal and other repercussions.

If you believe that you have suffered any such treatment, you should inform the Director of Audit Risk and Compliance immediately. If the matter is not remedied, and you are an employee, you should raise it formally under the Group's Grievance Policy using the Delamode Group Grievance Procedure. This Policy is not designed to replace the Grievance Policy, Procedure or associated documents.

7. Breach of 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 or fail to meet the high levels of commitment, we require in relation to modern slavery.

8. Reviews and Updates

This Policy and any associated Policy will be reviewed on a regular basis, at least annually, and will be updated and re-issued as required.

9. Associated Policies

- Whistleblowing Policy
- Anti – bribery and corruption Policy



10. Relevant legislation

- Modern Slavery Act 2015 (UK)

Document Control	
Function Owner	Central Finance
Policy Owner	Board
Policy Approval Route	CEO
Published date	02/05/2023
Version Number	V1
Effective date	02/05/2023
Next review date	01/05/2024

Version History	
Key Changes	Effective Date
Initial launch	02/05/2023



Appendix 1: Policy responsibilities

Management/ Directors Must:

- Read, understand, and follow the principles in this Policy and any associated documents.
- Keep up to date with changes to this Policy and any associated documents.

Employees Must:

- Read, understand, and follow the principles of this Policy and any associated documents.
- Seek clarification on any points which are unclear.

HR Teams Must:

- Read, understand, and follow the principles of this Policy and any associated documents.
- Support all Employees when using this, Policy.
- Monitor the application of this Policy to ensure fairness and consistent treatment; and
- Advise the Policy owner if they believe updates are required to the Policy.