



Modern Slavery Prevention Policy & Practices: Procurement and Supply Chain

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1. Commitment and zero-tolerance stance

We maintain a zero-tolerance approach to all forms of modern slavery, human trafficking, forced labour, servitude and exploitative labour practices within our business operations and supply chains. We uphold:

- UN Guiding Principles on Business and Human Rights
- ILO Core Labour Standards
- UN Sustainable Development Goal 8.7
- Relevant national legislation including the **Modern Slavery Act**.

We recognise our responsibility to protect vulnerable workers, promote safe labour practices and operate ethical, transparent and sustainable procurement.

2. Policy Statement

We commit to identifying, preventing, mitigating and responding to modern slavery risks by:

- Embedding due diligence through procurement and supplier management processes
- Fostering transparency and collaboration in our supply chain
- Continuously improving risk management systems and reporting

We expect the same standards from our contractors, partners and suppliers.

3. Risk-based Supplier Due Diligence

We apply a risk-based approach to procurement, including:

- Supplier risk assessment at onboarding and renewal
- Mapping supply chain tiers and geographies
- Screening for high-risk countries, sectors or activities
- Evaluating labour recruitment practices and workforce sourcing
- Reviewing supplier policies, certifications and compliance history

High-risk suppliers are subject to enhanced due diligence.

4. Ethical Procurement and Contracting Practices

We embed modern-slavery controls into procurement governance:

- Mandatory compliance clauses in all contracts
- Code of Conduct requirements for suppliers
- Standards for safe labour practices, fair wages and working conditions
- Prohibition of recruitment fees charged to workers
- Protection of migrant and temporary workers

We prioritise responsible purchasing and avoid practices that may create forced-labour pressures.

5. Supplier and Partner Compliance Requirements

All suppliers must:

- Comply with all human-rights laws and labour standards
- Maintain policies against child labour, forced labour and exploitation
- Provide transparency and access to audits or assessments
- Immediately take corrective action if risks are identified

Where suppliers fail to meet these commitments, we reserve the right to:

- Suspend relationships
 - Require remediation
 - Terminate contracts
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6. Auditing, Monitoring and Reporting

We maintain ongoing oversight of supply-chain risks through:

- Audits, inspections and supplier assessments
- Supply-chain traceability and reporting
- Continuous monitoring for labour risks
- Regular performance reviews

We engage specialists when necessary and support suppliers to improve-not just penalise.

7. Remediation and Grievance Mechanisms

We provide safe and confidential methods for workers and stakeholders to raise concerns without fear of retaliation, including:

- Whistleblowing channels
- Worker consultation pathways
- Corrective action and remediation plans

Any identified modern-slavery impact is addressed:

- Promptly
 - Transparently
 - In line with the UN Guiding Principles for remedy
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8. Training and Workforce Capability

We build modern-slavery awareness and expertise through:

- Training for procurement and operational staff
- Supplier education on risk and compliance
- Ongoing staff capability development

This supports proactive identification and prevention of exploitation.

9. Continuous improvement

We regularly review and enhance our procurement and supply-chain controls based on:

- Industry standards
- Emerging risks
- Regulatory changes
- Stakeholder feedback

We collaborate with industry, government and NGOs to strengthen ethical supply-chain outcomes.

Statement of Responsibility

We recognise the shared responsibility to protect workers and uphold human rights. We commit to full transparency and ethical business conduct and expect the same from all organisations in our value chain.
