



## Employees - Anti-slavery and human trafficking policy

### **1. POLICY STATEMENT**

- 1.1 The Deltic Group are committed to ethical and human rights principles. This policy sets out our expectations of all employees and any others who work in our business in relation to slavery and human trafficking issues.
- 1.2 Modern slavery is a crime as well as a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced, bonded and compulsory labour and human trafficking which are explained in more detail below. We are committed to acting ethically and with integrity in all our business relationships and this includes the removal of modern slavery from our business and our supply chain. We are implementing effective systems and controls to try and make sure that modern slavery does not take place anywhere within our business. Modern slavery exists in the UK so we cannot be complacent when it comes to these issues.
- 1.3 We are also 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. 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 high standards.
- 1.4 We are all responsible for this policy so it 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.
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **2. RECOGNISING MODERN SLAVERY**

- 2.1 Forced labour is any work or services which people are required to do against their will or under the threat of some punishment.
- 2.2 Debt bondage or bonded labour is when people borrow money that they cannot repay and are required to work to pay off the debt.
- 2.3 Compulsory labour is any work or services where a worker is forced to work because of an agreement made by people in control over the worker without the worker's consent.

2.4 Servitude is when a person is enslaved by or in service to another.

2.5 Human trafficking includes workers who have been forced, defrauded or coerced during any part of recruitment, harbouring or transporting process for the purpose of exploitation.

### **3. RESPONSIBILITY FOR THE POLICY**

3.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 The Head of Procurement has primary and 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.

3.3 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.

3.4 You 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 the Head of Procurement.

### **4. COMPLIANCE WITH THE POLICY**

4.1 You must ensure that you read, understand and comply with this policy.

4.2 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.

4.3 You must notify your manager or the Head of Procurement as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. If you have any concerns you can also use the whistleblowing policy and confidential hotline number.

4.4 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. Alternatively you may raise any issue in relation to modern slavery using our whistleblowing policy and/or the confidential hotline number.

4.5 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 chains constitutes any of the various forms of modern slavery, raise it with your manager or the Head of Procurement.

4.6 We recognise that we may require some external assistance when instances of modern slavery are identified. We may choose to involve external organisations with local expertise and, where appropriate and always taking into consideration the welfare and safety of local workers as a priority, we may decide to give support and guidance to suppliers to address exploitative practices and to eliminate them from our supply chain.

4.6 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 a concern. If you believe that you have suffered

any such treatment, you should inform the Director of Human Resources immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at:

[https://luminar1.sharepoint.com/Documents/\\_layouts/15/WopiFrame.aspx?sourcedoc=%7B6B175C4D-73DC-497D-A5FE-0B5A902C1BBA%7D&file=Deltic%20Group%20Grievance%20Procedure%20September%202012.rtf&action=default&IsList=1&ListId=%7B5ED9CA3A-393B-4AD1-9EBA-38451590A905%7D&ListItemId=1484](https://luminar1.sharepoint.com/Documents/_layouts/15/WopiFrame.aspx?sourcedoc=%7B6B175C4D-73DC-497D-A5FE-0B5A902C1BBA%7D&file=Deltic%20Group%20Grievance%20Procedure%20September%202012.rtf&action=default&IsList=1&ListId=%7B5ED9CA3A-393B-4AD1-9EBA-38451590A905%7D&ListItemId=1484).

## **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

5.1 Our commitment to addressing the issue of 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.

## **6. BREACHES OF THIS POLICY**

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.