

## **Anti Slavery and Human Trafficking Policy**

---

### **Purpose:**

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

### **Scope:**

This policy covers all Thurston Group, suppliers and end users.

This policy 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.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### **Policy:**

#### **Our commitment**

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 to exploit them for personal or commercial gain. In accordance with the Modern Day Slavery Act 2015, Thurston is committed to a zero tolerance approach to forced labour or child labour otherwise known as slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings 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 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.

As a manufacturer that sources products from many suppliers in the UK, we recognise that there is a risk, however small, that instances of slavery and human trafficking could occur within our supply chain. However, we support the promotion of ethical business practices and policies to protect workers from any kind of abuse or exploitation in relation to our business.

We source our products from the UK. Items sourced by our purchasing department are mainly machine manufactured goods, as opposed to handmade products that require a high degree of labour and hand tooling, therefore, the risk of slavery and human trafficking in the supply chain is low.

## **Anti Slavery and Human Trafficking Policy**

---

We will make all relevant employees aware of the risks of slavery and human trafficking occurring in our supply chains, and all our employees within the purchasing department and stores must understand and sign the business's Ethical Trading Policy.

We require all suppliers to comply with this policy before we will enter any contractual arrangement with them. We must now have confirmation of anti-slavery and human trafficking compliance with every supplier that we do business with.

Compliance with Thurston Group Ltd's Ethical Trading Policy and Anti Bribery and Corruption Policy is also a condition of doing business with us. If we are aware of any instances where a supplier has a slavery or human trafficking issue, or a supplier fails to provide us with the requisite assurances, we will not do business with them.

Our zero-tolerance approach to modern slavery in our business and supply chains is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

### **Due diligence**

As part of Thurston's on-going commitment to comply with the Modern Slavery Act, 2015, Thurston will both continue to monitor and mitigate any risks within Thurston and our supply chain so that effective controls and contingency plans can be put in place if required.

We ensure our Supply Chain Prequalification procedures are robust and include appropriate provision / KPIs for ascertaining the measures taken by our supply chain to help eradicate modern slavery.

Our procedural controls are reinforced by our strategic procurement approach to developing preferred supplier relationships with key supply chain partners, including for example materials providers with whom we work repeatedly and know very well. As part of our strategic relationship, these providers continue to actively support Thurston in raising internal awareness on the risks of modern slavery by presenting to our staff through internal webinars.

We operate a programme of independent audits with our suppliers and/or trade contractors to monitor compliance and resolve any points of awareness that arise in the audits.

The success of this Policy Statement is dependent upon all employees, supply chains and subcontractors playing an important part in helping to detect and eradicate slavery. As such, all individuals are encouraged to report any suspected slavery to their line management or HR Department.

### **Monitoring, auditing, reporting and review**

We routinely audit the performance of our business in accordance with recognised standards and methods. We review the credentials of our supply chain for constituent materials in accordance with the principles of responsible sourcing. We respond to non-conformances against our standards, and we implement a thorough management review process to ensure we meet our objectives and targets. This is applicable to all manufacturing and installation sites under Thurston control.

### **Your responsibilities**

## **Anti Slavery and Human Trafficking 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 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.

You must notify the HR Department as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future. Concerns may be raised under our Whistleblowing Policy, which provides a confidential route for reporting serious concerns, including suspected modern slavery, without fear of retaliation. 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 believe or suspect that a breach of this policy has occurred or that it may occur you must inform the HR Department 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 chains constitutes any of the various forms of modern slavery, raise it HR 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 because 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 HR Department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

### **Training**

To ensure a clear understanding of the Modern Slavery Act 2015 and the risks our business faces from modern slavery in its supply chain forms part of the induction process for all individuals who work for us, and regular training is provided as necessary. As a member of the Supply Chain Sustainability School, e-learning modules on the Modern Slavery Act are available to all member of the Sustainability School and our employees.

### **Breaches of this policy**

In the event of any suspected failure by a supplier to comply with our Ethical Trading Policy, Thurston will investigate. In the event of a breach of this policy, we will review the relationship with the supplier and take the appropriate remedial action.

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

### **Internal policies**

This Policy Statement is supported by our internal policies including our Ethical Trading Policy, Anti-Bribery Policy and Corruption Policy, Whistleblowing Policy and Grievance Procedure, which assist in ensuring that we conduct our business in a transparent manner, implementing effective controls to, for example, promote equal opportunities. These policies implement effective systems to ensure, as far as is practical, that human trafficking and slavery are not taking place in Thurston Group Ltd

## **Anti Slavery and Human Trafficking Policy**

or any of our supply chain. This statement is made under section 54(1) of the Modern Slavery Act 2015 has been approved by Thurston Group Ltd Board of Directors and will be reviewed annually.