

MODERN-SLAVERY 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 sanction the deprivation of a person’s liberty by another to exploit that person for personal or commercial gain.

Sumner Group Holdings Limited (SGH) has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships. We are committed to implement and enforce effective systems and controls that ensure modern slavery is not present anywhere in our own business or in any of our supply chains.

We are committed to ensuring 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.

As part of our contracting processes, we expect the same high standards from all of our contractors, suppliers and other business partners. In the coming year, we will 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.

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.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

Responsibility for the policy

SGH has the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with its contents.

SGH has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries on its contents, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. They are given adequate and regular training on this policy and the related issues of modern slavery in supply chains.

SGH personnel 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 “Managing Director.”

Compliance with the 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.

SGH personnel must ensure that they read, understand, and comply with this policy.

SGH personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy.

SGH personnel 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.

SGH personnel must notify their line manager OR a company director OR report it in accordance with SGH's Whistleblowing Policy as soon as possible, if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

SGH personnel should note that 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 any SGH personnel 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, they must bring it to the attention of their line manager or company director.

SGH aims to encourage openness and 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 any SGH personnel believe that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, and, as an employee, it should be raised formally using our Grievance Procedure, which can be found in the current employee handbook.

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Updates are provided using established methods of communication between the business and SGH personnel.

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 or gross misconduct. SGH may terminate relationships with other individuals and organisations working on our behalf if they breach this policy.

Signed for and on behalf of Sumner Group Holdings Limited

14 July 2021