

## **POLICY STATEMENT**

Sangwin Group recognises that modern slavery, in its various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which exploit affected persons for commercial gain, is a violation of fundamental human rights and is a crime. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We will take steps to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. 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 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 directors, employees at all levels, agency workers, subcontractors, external consultants, and business partners. This policy may amend at any time. It does not form part of an employee's contract of employment

## **RESPONSIBILITY FOR THE POLICY**

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.

The Operations Directors of each subsidiary company have 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are that they are given any required training.

## **COMPLIANCE WITH THE 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 chain 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 your manager or a director as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or a director or report it in accordance with our Whistleblowing Policy 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or a director.

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.

#### **COMMUNICATION AND AWARENESS OF POLICY**

To ensure that everyone associated with Sangwin Group is aware of this policy and on the risk our business faces from modern slavery in its supply chain, training will be given where ever needed.

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 appropriately thereafter.

#### **BREACHES OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action. Any breach will be considered as Gross Misconduct, which could result in dismissal.

This policy also applies to all our suppliers and subcontractors. We may terminate our relationship anyone working on our behalf if they breach this policy.



**David Spurgeon**  
**Director**  
**1st March 2017**