

## 4.14 Modern Slavery and Human Trafficking Policy

### 1. General Statement

It is our policy to conduct all of our business in an honest and ethical manner. The Company acknowledges responsibility and compliance to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

Modern slavery is a crime and a violation of fundamental human rights. The Company has a zero-tolerance approach and we are committed to being an ethical and responsible business implementing and enforcing effective systems and controls that aim to ensure modern slavery is not taking place anywhere in our own business or in our supply chain.

### 2. Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, agency workers, and any other person providing works or services to the company. We want to be confident that people who are contributing to our success are not subject to any form of human rights abuse, including that of modern slavery. Our approved suppliers are expected to support this policy or have their own similar policy in place.

### 3. Responsibility for the policy

The Chief Executive has overall responsibility for ensuring this policy complies with our legal obligations and that all those under our control comply with it. The Chief Executive also has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal controls to ensure they are effective in countering modern slavery.

The company will not support or deal with any business knowingly involved in slavery or human trafficking. The Chief Executive and senior management shall take responsibility for implementing this policy and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

### 4. Raising Concerns

All persons working for the company must ensure that they read, understand and comply with this policy. All persons working for us are encouraged to raise concerns about any issue or suspicion of modern slavery and human trafficking at the earliest possible stage and report the issue to the Chief Executive or Operations Manager who will take the appropriate action. Further guidance, signs to look out for, and reporting details can be obtained from the Chief Executive. No employee will suffer any detriment as a result of raising genuine concerns about modern slavery and human trafficking, even if they turn out to be mistaken.

### 5. Monitoring

Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action and may result in dismissal without notice. We may terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

This policy will be regularly reviewed (minimum annually).

Signed on behalf of STC Limited

Pippin Newman  
Chief Executive  
February 2022

