

SCHEDULE 5: MODERN SLAVERY ACT POLICY

1. ABOUT THIS POLICY

- 1.1 We have a zero-tolerance approach to slavery and human trafficking, and 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 committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 1.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time with the appropriate notification. It will be reviewed regularly.

2. WHO MUST COMPLY WITH THIS POLICY?

- 2.1 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, and third-party representatives. A separate policy exists for suppliers and other business partners.

3. WHAT IS SLAVERY AND HUMAN TRAFFICKING?

- 3.1 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 in order to exploit them for personal or commercial gain.

4. RESPONSIBILITY FOR AND COMPLIANCE WITH THE POLICY

- 4.1 The Legal and Compliance Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The General Counsel and Company Secretary 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.
- 4.3 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.
- 4.4 Each employee or non-employee that this policy applies to must ensure that they have 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.
- 4.5 You must notify the CEO as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if you suspect that a supplier is behaving in a way which undermines the aims of the Modern Slavery Act 2015. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain (of any supplier tier) at the earliest possible stage. If you believe or suspect slavery or human trafficking has occurred or that it may occur, you must notify the CEO as soon as possible.

4.6 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 SMT member or the General Counsel and Company Secretary.

5. HOW TO RAISE A CONCERN

5.1 If you are concerned that a breach of this policy has occurred or may occur, as noted above, you should ensure that it is reported to the CEO as soon as possible, or if this is not viable it should be reported to a member of the SMT or the General Counsel and Company Secretary as soon as possible.

6. PROTECTION

6.1 Individuals who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. 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.

6.2 We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in behaviour which could breach this policy, or 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 our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the CEO 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 in this employee handbook.

7 COMMUNICATION AND AWARENESS OF THIS POLICY

7.1 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.