

MODERN ANTI-SLAVERY POLICY

Policy Statement

In carrying out its functions **Restek UK Limited** ("the Company") is committed to carrying out a zero-tolerant approach to all forms of Modern Slavery and Human Trafficking. The Company believes that any identified act of slavery or human trafficking is an indefensible violation of an individual's human rights.

We recognise our responsibilities under the Modern Slavery Act 2015 and this policy sets out the ethical approach the Company will assume to prevent Modern Slavery and Human Trafficking, and ensure, as far as we can, that our supply chains also uphold measures to safeguard against these activities.

Responsibility for the Policy

The Company's Senior Management Team (SMT) has overall responsibility for ensuring this policy complies with all legal and ethical obligations, and all those under the controls of the Company comply with it.

The SMT are responsible for ensuring all employees understand and comply with this policy and are given regular training to understand and recognise signs of modern slavery in business.

The Company's Commitment and Responsibilities

The Company's policy of direct employment is supported by strong processes which ensure an individual's identity is confirmed prior to commencement of employment and they have a legitimate Right to Work in the UK. The Right to Work checks undertaken significantly reduces the risk of directly employing forced labour or those who may be subject to human trafficking.

Should the Company utilise sub-contractors, we have a due diligence process in place to ensure sub-contractors comply with our commitment to prevent modern slavery. They are also asked, prior to working on site, to provide all necessary documentation for the individuals providing the works so we can check for forced labour, etc. Likewise, when we require temporary labour, we use the same due diligence process to ensure the agency is committed to the prevention of modern slavery, and again we check the individuals' documentation to ensure they have the Right to Work in the UK and are not forced labour.

The Company has a zero-tolerance approach to modern slavery and human trafficking in our organisation and our supply chains. The prevention, detection and reporting of these types of activities in any part of our organisation or supply chain is the responsibility of all those working for the Company or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

Supply Chain Management

All of the Company's business partners are required to meet our high standards regarding human rights and employment issues. The Company uses ethical and responsible supply chain management and expect our business partners to adopt a similar approach to their suppliers.

The Company has introduced a *'Third-Party Code of Ethics'*, which incorporates best practices and expectations on our suppliers to ensure they are aligned with the Company's processes and goals.

All the Company's suppliers, employment and recruitment agencies, and other third parties supplying workers to our organisation are expected to confirm their compliance with our Third-Party Code of Ethics.

As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us to carry out audits of suppliers for their compliance with our Third-Party Code of Ethics.

Spotting the Signs of Modern Slavery

Someone in slavery might:

- Appear to be under the control of someone else and reluctant to interact with others.
- Not have personal identification on them.
- Have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work.
- Not be able to move around freely.
- Be reluctant to talk to strangers or the authorities.
- Appear frightened, withdrawn, or show signs of physical or psychological abuse.
- Be dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

Reporting Modern Slavery

If a case of modern slavery is identified or suspected and life or health is not in immediate danger, the Company's workers and business partners are advised it should be reported to the police immediately by phone on the number 101.

Alternatively, it may be reported on line: <https://www.modernslaveryhelpline.org/report>.

If potential victims are in immediate danger, the standard 999 emergency number should be used.

If you are unclear whether particular treatment (whether a one-off or repeated act or omission) within the Company's operations or those of any supplier within the Company's supply chains constitutes modern slavery, please raise this as soon as possible through with the Company's Managing Director.

When a victim of modern slavery is identified and it is reported, they will receive appropriate support from the authority dealing with modern slavery issues.

Disclosure Protection

The Company encourages openness and honesty and will support any individual who raises genuine concerns under this policy, even if they are mistaken. No person will suffer any detrimental treatment as a result of raising a concern in good faith.

Detrimental treatment may include: dismissal, disciplinary action, threats or any other unfavourable treatment connected with raising a concern.

Review and Action

The Company recognises the importance of regularly reviewing this policy to ensure it reflects up-to-date equality legislation and best practice.

A review of our Modern Slavery Policy will be carried out on an annual basis as a minimum and any necessary actions taken.

Signed:

Date: 31st January 2024

Timothy Knight
Managing Director