



## Company Rules, Policies & Procedures

Legislation may change before, during or after these Rules, Policies & Procedures have been issued or revised. In all cases legislative wording takes precedence.

### DWT- 48 Modern Slavery and Human Trafficking Policy 2026

#### Statement

**1.1** Modern slavery is a serious crime and a violation of fundamental human rights. It encompasses various forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of an individual's liberty for exploitation, whether for personal or commercial gain. Our organisation adopts a zero-tolerance stance toward modern slavery and is committed to conducting all business dealings and relationships ethically and with integrity. We implement robust systems and controls to ensure that modern slavery is not present in our business or supply chains.

**1.2** We are dedicated to ensuring transparency in both our operations and our efforts to combat modern slavery throughout our supply chains, in line with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and business partners, including strict prohibitions against the use of forced, compulsory, or trafficked labour, or any individuals held in slavery or servitude, whether adults or children. We also expect our suppliers to enforce these high standards within their own supply chains.

**1.3** 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.

**1.4** This policy does not form part of any employee's contract of employment, and we may amend it at any time.

#### Responsibility for the Policy

**2.1** The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

**2.2** The Managing Director 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.

**2.3** 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.

**2.4** You 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.

#### Communication and Awareness of this Policy

**3.1** All employees must read, understand, and comply with this policy.

**3.2** 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.

**3.3** You must notify your manager, HR, or report it in accordance with our Whistleblowing Policy as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur.

Version	<b>05</b>	Review Date	Document reviewed during March <b>2026</b>
Revision	<b>09</b>	Next Review Date	To be reviewed during March <b>2027</b>

**3.4** You 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.

**3.5** 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 chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Managing Director.

**3.6** 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. 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 you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## Training

**4.1** Training on this policy and awareness of modern slavery risks will be provided to employees as appropriate to their role. This will form part of the induction process, with further training provided where required.

**4.2** Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the beginning of our business relationship and reinforced as necessary throughout the relationship.

## Due Diligence

**4.3** The Company will take reasonable steps to assess and manage the risk of modern slavery in its business and supply chains. This may include appropriate due diligence on suppliers, risk assessments, and contractual controls where necessary.

**4.4** The level of due diligence applied will be proportionate to the level of risk identified.

## Breaches of this Policy

**5.1** Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

**5.2** We reserve the right to terminate our relationships with contractors, suppliers, or other individuals and organisations working on our behalf if they breach this policy.



Mark Watson  
MANAGING DIRECTOR

Version	<b>05</b>	Review Date	Document reviewed during March <b>2026</b>
Revision	<b>09</b>	Next Review Date	To be reviewed during March <b>2027</b>