

MODERN SLAVERY POLICY

This policy demonstrates Smithers Purslow's commitment to Anti- Slavery and ensuring that all staff are trained to recognise Modern Slavery.

As a company, we are devoted to ensuring there is transparency in our business and in our approach to tackling any modern slavery throughout our supply chains. We do expect the same standards from all of our contractors, suppliers and business partners, and 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, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy will apply to all those working for us or on our behalf in any capacity, including the following: directors, officers, volunteers, interns, contractors, agency workers, third party representatives, seconded workers, agents, external consultants and business partners.

SCOPE

- The prevention, detection and reporting of modern slavery is the responsibility of those working for or on behalf of the Company. If it is believed or suspected that a conflict with the Modern Slavery Act 2015 has occurred, the person working for or on behalf of Smithers Purslow is required to inform a Company Director.
- If there are any issues or suspicions of modern slavery as defined by the Modern Slavery Act 2015 in any parts of our Company, staff members should raise concerns with a Company Director in accordance with our Whistleblowing policy immediately.
- Training on this policy forms part of the induction process for every individual that works for us, and regular training will be provided when necessary.
- Any employee who breaches this policy will face disciplinary action, which could then result in dismissal.
- If any other individuals and/or organisations that work on our behalf breach this policy, we can terminate our relationship with them.

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COMPLIANCE

The company and its suppliers will:

- Follow all appropriate anti-slavery and human trafficking laws, statutes, regulations and codes in accordance with the Modern Slavery Act 2015.
- Follow this anti-slavery policy **OR** have and maintain its own policies and procedures to ensure its compliance.
- Not engage in any activity, practice or conduct that would constitute an offence under sections 1,2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK.
- Include anti-slavery and human trafficking provisions that are at least as onerous as those set out in this clause, that each of its subcontractors and suppliers shall comply with the anti-slavery policy and will all related anti-slavery and human trafficking laws, statutes, regulations, and codes.



Managing Director

01 February 2022