



## Anti-Slavery and Human Trafficking Policy

### Policy Statement

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 ("modern slavery"). All of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Slimdril Limited (Slimdril) has a zero-tolerance approach to modern slavery within its business and supply chains.

This Policy applies to all persons, working for Slimdril or on our behalf, in any capacity, including employees at all levels. Directors, managers, admin staff, engineers, workshop operatives, Agency workers, volunteers, interns and agents

In addition, our contractors, external consultants, third party representatives and suppliers.

Slimdril is committed to acting ethically and with integrity in all our business dealings and relationships.

Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

Ensuring there is transparency in our approach to tackling modern slavery in our business and our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect high standards from all our suppliers, and we expect that our suppliers will hold their own suppliers in the same high standards.

### Identifying Modern Slavery

Modern slavery may be found in our supply chains, our outsourced activities particular to jurisdictions that may not have adequate modern slavery safeguards.

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking.

- a) The person is not in possession of their own passport, identification or travel documents.

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- b) The person is acting as though they are being instructed or coached by someone else.
- c) The person allows others to speak for them when being spoken to directly.
- d) The person is dropped off and collected from work.
- e) The person is withdrawn or appears frightened.
- f) The person does not seem to be able to contact friends or family freely.
- g) The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

#### **Responsibility for this Policy and Compliance**

The Slimdril Management has overall responsibility for ensuring this policy complies with Slimdril's legal and ethical obligations.

The Slimdril management has the primary and responsibility for implementing this policy, and dealing with any queries about it.

All Slimdril staff must comply with this policy

All Slimdril's suppliers must comply with this policy.

#### **Reporting Modern Slavery**

Slimdril staff and suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- a) If you are member of Slimdril staff, to your line manager
- b) If you are a supplier to your primary contact at Slimdril.

#### **Publication of this Policy**

This policy is available to all Slimdril staff via the shared documents, on the company server.

This policy is available to suppliers on request.

#### **Breaches of this Policy**

All Slimdril staff members who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The relevant member of Slimdril may terminate its relationship with a supplier if it breaches this policy. Alternatively, the relevant member of Slimdril may elect to work with the supplier to resolve such issues.

#### **Policy Review**

Slimdril is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and best practices.

The policy does not form part of any contract of employment and may be amended at any time.

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