

	Policy Number	EPC/HR022
	Policy Name	Modern Slavery Policy
	Issue Number	3
	Authority/Author	J A Wootton

## Modern Slavery Policy

### Purpose of this Policy:

- Modern slavery is a criminal offence under the Modern Slavery Act 2015 (“the Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of EPC United Kingdom Plc with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- We have a zero tolerance to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses supply chain.

### Steps for the prevention of Modern Slavery

- We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. It is essential that our suppliers hold their own suppliers to the same high standards.
- All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employee’s obligations under their contract of employment.
- Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures.
  - Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts and be focused on those areas
  - Engage with our suppliers both to convey to them our Modern Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
  - Where appropriate as informed by our risk assessment, seek to introduce supplier pre-screening (for example) as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
  - Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

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- From finance year 2016 we will include in the directors' report accompanying our annual financial statements a reference to the Company's Modern slavery and Human Trafficking statement, which will be presented on our website during the course of 2017.

### Responsibility for the Policy

- Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The Board of Directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- Managers 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.

### Action to Report Modern Slavery or Human Trafficking

Whistleblowing Procedure – direct access to senior leadership

The Company's Whistleblowing procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found on the Intranet.

In summary, employees should approach a Director of EPC United Kingdom Plc or the Head of Human Resources. The nature of the complaint will determine the Company's next course of action.

### Safeguards

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 that 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 business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

### Communication and Awareness of this Policy

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.

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**Review**

Following its initial adoption, this Modern slavery Policy will be reviewed by the Company's Senior Management Team on a regular basis (at least annually) and may be amended from time to time.

**Revision History**

Human Resources are responsible for the existence and review of the Human Resources Policy and Procedures

Issue	Issue date	Changes
1	01.05.2017	New Policy
2	09.02.2018	Policy Review
3	17.08.2020	Policy Review
4		

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