

ANTI SLAVERY & HUMAN TRAFFICKING - 3245

UNITED LIVING GROUP



1 PURPOSE AND SCOPE

Modern slavery and human trafficking are crimes and a serious violation of fundamental human rights. Modern slavery takes various forms, such as slavery, servitude, bonded labour, forced and compulsory labour, all of which have in common the exploitation of a person for personal or commercial gain, usually by means of coercing or deceiving that person into labour which has not been freely chosen. Human trafficking is the organisation of travel for a person with a view to that person being exploited on arrival at the place of destination.

One of our core values is Honest Endeavour. We have a zero-tolerance approach to modern slavery in all its forms and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring 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 and ethical values from all of our sub-contractors, suppliers and other business partners. 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 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.

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

2 RESPONSIBILITY FOR THE POLICY

The Board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group General Counsel 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.

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.

3 COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains 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.

You must notify the Group General Counsel and People Services or report it in accordance with our Whistle Blowing Policy as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.

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.

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 the Group General Counsel or People Services.

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 People Services or report it in accordance with our Whistle Blowing Policy immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy.

4 COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery will also guide the relationships we form with our supply chain. We will set out to audit suppliers as appropriate in order to ensure that these organisations are not exposed to any form of modern slavery or human trafficking. Our values and requirements must be communicated to all new and on-going suppliers, contractors and business partners. At the outset of our business relationship, we will clarify with them our expectations from them as trading partners and reinforce this over time as appropriate.

5 BREACHES OF THIS POLICY

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

A handwritten signature in black ink, appearing to read "Ian Burnett".

Ian Burnett
CHIEF EXECUTIVE OFFICER
United Living Group