

# UNITECH INDUSTRIES GROUP

## ANTI SLAVERY & HUMAN TRAFFICKING POLICY

### **1. INTRODUCTION**

The policy aims to ensure that everyone understands the processes relevant to their area of work. The organisation recognises that the health, safety and welfare of employees, sub-contractors and anyone else directly affected by the organisation's operations are of prime importance. The organisation has therefore developed and enforces a dedicated Anti-Slavery and Human Trafficking Policy.

### **2. POLICY STATEMENT**

This Statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Unitech Industries Group of Companies slavery and human trafficking statement for the financial year which runs January to December.

Unitech Industries Group are committed to improving our practices to combat slavery and human trafficking.

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, 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. We have a zero tolerance approach to modern slavery 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 from all of our contractors, suppliers and other 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 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, trainees, interns, apprentices, contractors, external consultants, third-party representatives and business partners.

### **3. POLICY AIM**

This policy has been designed to assist with anti-slavery & human trafficking arrangements involving all Companies who operate within the Unitech Industries Group. These include but are not exhausted to those Companies highlighted above. All employees, contractors and suppliers involved with any aspect of Antislavery and Human Trafficking are made aware of this policy. Within this document, anything described as "The Company and or Organisation "relates to any of those that form part of the 'Unitech Group'.

### **4. STAFF WHO NEED TO MAKE THEMSELVES AWARE OF THIS PROCEDURE**

- All employees who work for the Company and/or any subsidiary Companies in any capacity.
- All Managers at all levels within the Group, especially those involved with the Supply Chain function.

### **5. PERSONNEL RESPONSIBLE FOR IMPLEMENTATION OF POLICY**

The Company Group Directors have overall responsibility for this policy, and responsible for monitoring and reviewing the operation of the policy.

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Managers have a specific responsibility to operate within the boundaries of this policy, to facilitate its operation by ensuring that workers understand the standards of behaviour expected of them and to identify and act upon behaviour falling below these standards.

All workers are responsible for the success of this policy and should ensure that they take the time to read and understand it. Questions regarding the content or application of this policy should also be directed to the Group HR Manager.

This policy is applicable to all employees at whatever level of the organisation's hierarchy. This policy will be communicated to all employees and interested parties.

It is the HR department and/or any managers involved in recruitment for informing job applicants of this policy, and as part of the organisation's induction process, new starters are told and given a copy of this policy.

## **6. RESPONSIBLE SOURCING - SUPPLIER CODE OF CONDUCT**

The Unitech Industries Group are committed to upholding the Ten Principles surrounding Human Rights, Labour, Environment and Anti-corruption, accepting standards set out in the Ethical Trading Initiative (ET I) Base Code of Labour Standards and pursuant to section 54 of the modern Slavery Act 2015. This means that as far as is reasonably practicable, we will ensure that we operate in ways which meet fundamental responsibilities in these areas. We encourage responsible business practices throughout our supply chain by only engaging with suppliers and sub-contractors, who approach and manage their business in an ethical, social and responsible manner in line with national legislation. To ensure that our objectives are met, we stipulate a supplier code of conduct.

The Unitech Industries Group UK code of conduct outlines minimum supplier standards expected by the Unitech Industries Group and all sister Companies. The code of conduct is a mandatory requirement and all suppliers are expected to adhere to these, with the ability to demonstrate compliance. The Unitech Industries Group will not knowingly engage with any suppliers that operate poor labour practices that breach our code of conduct. We reserve the right to audit suppliers where we consider it necessary.

We encourage all suppliers to communicate an Anti-Slavery and Human Trafficking policy, Ethical Trading & Supplier Code of Conduct across their supply chain, so far as is practically possible.

It will remain the duty of all those involved when tendering for new business and or provisions of services and goods, to check that the Company in question, adheres to Anti-Slavery and Human Trafficking requirements. Copies of any policies received, will be held on record.

### **6.1 Due Diligence Processes and Supplier Adherence**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our Values, we have in place a supply chain compliance programme. As part of our initiative to identify and mitigate risk we will be carrying out the following activities during 2017 and beyond:

- Contacting existing suppliers and sub-contractors to ask them to confirm their adherence to our Anti-Slavery Policy.
- Ensuring that new suppliers and sub-contractors undertake to comply with our Antislavery Policy through use of due diligence questionnaires and relevant contractual provisions, with appropriate termination provisions for failure to comply.
- Ensuring that the high-risk areas as identified are kept under regular review to determine whether additional and/or targeted measures are required within our supply chain to combat the risk of slavery and trafficking.
- Ensuring that our whistleblowing procedure is distributed sufficiently to encourage whistleblowing in relation to any identified breaches of our Anti-Slavery Policy.

## **7. 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.

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You must notify your manager as soon as possible if you believe or suspect that a conflict with 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 your manager.

## **8. HUMAN RIGHTS**

Suppliers shall support and respect the protection of internationally proclaimed human rights.

## **9. TRANSPARENCY**

We will strive to be open and honest when we work with others and ensure reporting is fair and transparent.

## **10. CHILD LABOUR AND YOUNG WORKERS**

There shall be no use of child labour.

In the event of any child found to be performing child labour, they shall be removed from the workplace immediately. The supplier shall then participate and contribute to the provision for the transition of the child, to enable her or him to attend quality education until no longer a child.

Young persons under 18 shall not be employed at night or in hazardous conditions.

These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards

## **11. FORCED LABOUR**

There shall be no forced, bonded or involuntary labour.

Workers are not required to lodge monetary deposits or their identity papers with their employer and are free to leave their employment after reasonable notice.

## **12. PHYSICAL/MENTAL PUNISHMENT**

Violence, threat of violence or inhumane treatment of employees is not acceptable. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment verbal abuse or other forms of intimidation shall be prohibited. The provisions of this policy constitute minimum and not maximum standards. We will ensure that this policy is communicated and available to all relevant stakeholders as appropriate.

## **13. DISCRIMINATION**

There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion, or caste unless provided for in domestic legislation.

## **14. WORKERS & EMPLOYMENT**

Only workers with a legal right to work in the country should be employed. For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.

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## **15. AGENCY WORKERS**

Labour providers should only supply workers registered with them. Relationships with Labour providers should be covered by a Service Level Agreement which meets all national legal requirements. Labour providers should be independently audited on a regular basis to ensure compliance with national requirements/legislation.

## **16. DIGNITY AT WORK**

The organisation has a separate dignity at work policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with. (See U.I-151 - Dignity At Work Policy).

## **17. CUSTOMERS SUPPLIERS AND OTHER PEOPLE NOT EMPLOYED BY THE ORGANISATION**

The organisation will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the organisation. Employees should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

## **18. REMUNERATION**

Wages and benefits paid for a standard working week must meet; at a minimum and be in line with national legislation. Workers shall be made aware of their employment conditions.

All workers shall be provided with written and understandable information about their employment conditions including information with respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid. Deduction from wages as a disciplinary measure shall not be permitted.

## **19. HEALTH SAFETY AND HYGIENE**

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable the causes of hazards inherent in the working environments.

Workers shall receive regular and recorded health and safety training. Workers are provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.

Accommodation where provided, shall be clean, safe and meet the basic needs of the workers. A senior management representative shall be responsible for Health & Safety.

## **20. WORKING HOURS**

Employee working hours must comply with national legislation or industry standards. Overtime shall be voluntary and paid in accordance with national legislation and only applicable to those aged 18 years and over.

## **21. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Suppliers shall recognise the right of employees who join organisations of their choice.

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## 22. ENVIRONMENT

Suppliers are required to make continuous improvements in their environmental performance such as reducing packaging, increasing recycling and reducing greenhouse gas emissions. These must also comply with national and international laws and regulations.

## 23. ANTI-CORRUPTION

Suppliers are expected to work to the highest standard of ethics, honesty, equality and integrity. Corruption in all its forms, including extortion and bribery are not permitted.

## 24. SALES

Where the Group tenders for contracts, all those concerned will ensure that we have complete transparency when dealing with all parties involved in new business, thus ensuring compliance to any ethical trading requirements.

## 25. BREACH OF THIS POLICY

Breach of this policy will be treated as misconduct. Whether it is minor or gross misconduct will depend on the circumstances. Anyone suspected of breaching this policy may be subject to the Company's Disciplinary Procedure. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

## 26. MAINTAINING THIS POLICY

The organisation will monitor the effectiveness of this policy and its general compliance within the organisation.

This policy will be kept up to date and amended accordingly to reflect any changes in response to revised legislation and applicable standards and guidelines.

This policy is fully supported by the Board and all the senior management of the organisation. In support of this the policy will be reviewed annually. The organisation will provide sufficient support and all other necessary resources for the full implementation.

As with all policies, procedures and documentation implemented by the Unitech Group, the basis of this procedure has been formed on statutory law and/or legal guidance. All staff are invited to comment on this policy and suggest ways in which it might be improved. Any suggestions should be sent to the Group HR Manager who will liaise with the Group Board of Directors responsible for this document.

## 27. DEFINITIONS

### **Child:**

Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

### **Young Person:**

Any worker over the age of a child as defined above and under the age of 18.

### **Child Labour:**

Any work by a child younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

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**ILO:**

International Labour Organisation.

**Unitech Group:**

Unitech Industries Ltd and any of its Subsidiaries (as defined in section 1 159 of the Companies Act)  
**Hazardous Conditions:**

The following are examples of hazardous work according to the ILO:

- Work which exposes children to physical, psychological, or sexual abuse.
- Work underground, underwater, at dangerous heights, or in confined spaces.
- Work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads.
- Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents, or processes, or to temperatures, noise levels, or vibrations, damaging to their health.
- Work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.

**28. FURTHER ACTIONS AND SIGN-OFF**

The Board of Directors of the Company delegate the approval of this statement on its behalf of the Managing Director of the Company.

**Approved and Signed on behalf of the Unitech Industries Group**

**Mark Street**



**Group Finance Director**

**Date:**

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