

# Modern Slavery Policy

This policy supports Donald Ward Limited's (the Company<sup>1</sup>) commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains, or any other business relationship.

This policy applies to all persons working for, or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants, apprentices and any other third party representative.

We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

This policy will be used to underpin and Inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act (MSA) 2015.

## What do we mean by Modern Slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- **Slavery:** where ownership is exercised over an individual.
- **Servitude:** involves the obligation to provide service imposed by coercion.
- **Forced and Compulsory Labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- **Human Trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which we will not tolerate, but are specifically referenced in the MSA include, but are not limited to:

- **Child Labour:** whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain, and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

## How we seek to embed our policy in practice.

To underpin our policy commitments, we aim to implement the following measures:

- All employees must ensure that they have read, understood, 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.
- We will conduct risk assessments to determine which parts of our won business and which of our supply chains are most at risk from modern slavery, so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, as informed by our risk assessment, we will engage directly with new suppliers in respect of our modern slavery policy in order to gain a proper understanding of the measures that have in place to ensure that modern slavery is not occurring within their own business.
- All employees must immediately notify their Line Manager or the HR Manager of a suspected conflict or issues surrounding modern slavery and or human trafficking. Employees and suppliers are encouraged to raise any possible concerns at any time. Employees are protected under our Whistleblowing Procedure.

<sup>1</sup> The Company refers to Donald Ward Limited and all associated trading names, including, but not limited to: Ward, Ward Special Projects, and Clancey and Sons (Clancey's of York).

- 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 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 the HR Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Company Handbook.

### **Effectiveness in combating slavery and human trafficking.**

We use the following key performance indicators (KPIs) to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The percentage of suppliers and sub-contractors vetted for ethical labour practices.
- The number of inspections of direct suppliers and sub-contractors in our supply chains in the past year.
- The number of reported breaches in the past year.
- The percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.
- [OTHER].

### **Responsibility for this policy.**

The Board of Directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The HR Team have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

### **Communication and employee awareness training.**

Line Managers will ensure that all staff receive adequate training on this policy and any supporting processes applicable to their role. This is normally given at induction.

In addition, staff receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identification of individuals / areas of the business that may be at risk from practices of modern slavery.

### **Breaches of this policy.**

Any breaches of this policy will be taken seriously and shall be dealt with on a case-by-case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our Disciplinary Procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is clear, clarification should be sought from the HR Team.

**Status of this policy.**

This policy will be reviewed by the Company's Board of Directors on a regular basis.

This policy does not give contractual rights to employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties, in writing, of any changes which may affect them.

**Signed:**



**Name:** James Balfour

**Date:** December 2023

**Position:** Director