



## Anti-Slavery and Human Trafficking Policy

### Edis AV limited

#### Policy statement

The Company is committed to taking steps to ensure that modern slavery is not taking place:

- in any part of its own business; and
- in any of its supply chains.

The Company expects all members of staff:to work with the Company as it takes these steps;

- to remain vigilant in identifying circumstances where there is a risk that modern slavery might be occurring in any part of the Company's business or in any of its supply chains;
- to report any such circumstances to senior management in full and without delay; and
- to conduct their own personal and domestic affairs in such a way to ensure that they are in no way connected with modern slavery either through the commission of a criminal offence or through actions or omissions that might bring themselves and the Company into disrepute.
- For the purposes of this Policy, "members of staff" means all persons working for or with the Company in any capacity including: officers and directors, employees, workers, contractors, secondees, interns, agents, consultants and agency workers.
- The Company expects the same standards from all of its contractors, suppliers and other business partners. The Company will seek to ensure, where reasonably practicable, that its contractors, suppliers and other business partners are contractually

obliged to comply with terms that reflect the spirit and intention of this Policy in their own businesses and in their own supply chains in support of the general eradication of modern slavery.

- The Company will from time to time assess and review the risk that modern slavery may be occurring in any part of its own business and in any of its supply chains. In light of any such risk assessments it may from time to time seek specific reassurances from its contractors, suppliers and other business partners; and seek to carry out due diligence or specific audits either itself or through third parties to satisfy itself that modern slavery is not occurring.

- The Company is committed to transparency in its approach to tackling modern slavery consistent with its disclosure obligations under section 54 of the Modern Slavery Act 2015.

### **Application of the Policy**

- This Policy applies to all members of staff.

- All members of staff are expected to:

- read, understand and comply with this Policy; and

- raise concerns with their manager or Human Resources. Please also refer to our Whistle blowing Policy about any suspicion that modern slavery might be occurring in any part of the Company's business or in any of the Company's supply chains at the earliest possible opportunity.

- The Company wishes to encourage openness and will support anyone who raises a genuine concern that modern slavery might be taking place in any part of the

Company's business or in any of the Company's supply chains, even if that concern ultimately turns out to be mistaken.

- This Policy also reflects the expectations that the Company has of its contractors, suppliers and other business partners.

### **Responsibility for the Policy**

- The Company's board of directors have overall responsibility for this Policy, including ensuring that it complies with legal and ethical obligations.

- Human Resources is primarily responsible for the day-to-day implementation of the Policy including monitoring its effectiveness and ensuring that all staff are aware of, understand and comply with the Policy.

- All staff are responsible for following the Policy to the extent that it affects their day-to-day work and in particular in respect of the reporting requirements.

- Human Resources welcomes any questions or comments on this Policy and suggestions for ways in which it or procedures relating to the eradication of modern slavery might be adopted, adapted or improved.

### **Sanctions**

- Any breach of this Policy by any member of staff including in respect of his or her duties for the Company or in respect of his or her personal and domestic affairs may be dealt with under the Company's disciplinary procedures and could result in dismissal.

- In the event that the Company has a reasonable belief that modern slavery is occurring in any part of its business:

The Company will:

- put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and
- monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims;
- the Company may, depending on the facts, deal with the matter under its disciplinary procedures which could result in the dismissal of any member of staff found to be responsible.
- In the event that the Company has a reasonable belief that modern slavery is occurring in the business or supply chains of any contractors, suppliers and other business partners, the Company:
  - will expect the relevant contractor, supplier or other business partner:
  - to be fully transparent and supply such information as the Company may reasonably request in relation to the issue;
  - to put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and
  - to monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
  - to report to the Company at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such modern slavery ceases to occur;
  - may, depending on the facts and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the relationship or otherwise

cease, reduce or minimise business contact with the relevant contractor, supplier or other business partner.

## **Training**

- The Company provides more specific training to those members of staff through whom the steps taken by the Company in compliance with this Policy are most likely to be taken. The aim of the training is to ensure a high level of understanding of the nature of modern slavery and the influence the Company is able to bring to ensure that it does not occur within any part of its own business and in any of its supply chains.
- The Company expects its contractors, suppliers and other business partners to provide similar training to their members of staff.

## **Amendments to the Policy**

- The Policy expresses the will of the Company and its commitment to the issues addressed. However, it does not in itself create any contractual obligations and may be amended by the Company at its discretion at any time.
- The Policy will be reviewed by the Company's board of directors on a regular basis, usually at the same time as the board reviews the Company's annual Slavery and Human Trafficking Statement

## **This procedure has been prepared, approved & authorised by:**

- Prepared by:** D J Edis-Bates Managing Director
- Date:** 1 May, 2019
- Last Reviewed:** 1 October 2020