

Modern Slavery Policy Statement.

Sefas is committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and implementing effective systems and controls to ensure, insofar as we are able, slavery and human trafficking is not taking place anywhere in our supply chains.

Sefas acknowledges its responsibilities under the Modern Slavery Act 2015 and will strive to ensure transparency within the organisation and with suppliers of goods and service to our organisation. As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited, and we procure goods and services from a restricted range of UK and overseas suppliers. Sefas does not and will not knowingly support or deal with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our policies in relation to the Modern Slavery Act 2015

The following policies are available to all staff via the company intranet or the Staff Handbook:

- Code of conduct
- Ethics policy
- Whistleblowing Policy
- Bullying and harassment policy
- Equity Diversity and Inclusion policy
- Recruitment and selection policy

Embedding the principles

We will continue to embed the principles through:

- ensuring that any staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices
- ensuring staff involved in procurement activity are aware of and follow <u>modern slavery</u> <u>procurement guidance on GOV.UK</u>
- ensure there is a general staff awareness of the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring that consideration of the modern slavery risks and prevention are added to our policy review process as an employer and procurer of goods and services
- making sure that our procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero-tolerance policy towards modern slavery



Our UK Board of Directors takes responsibility for implementing this policy statement and its objectives and shall provide resources (training etc) to ensure that slavery and human trafficking is not taking place within the organisation and, to the best of our abilities, within our supply chains. We may terminate any agreement or arrangement with other individuals and organisations working on our behalf if they breach this policy. Any employee who breaches this policy may face disciplinary action, and in serious cases, dismissal for misconduct or gross misconduct.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

Dave Chilman

Chief Operating Officer

Sefas UK March 2025