

Modern Slavery & Human Trafficking 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, that 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 services to our organisation. As an equal opportunities employer, we are committed to creating and maintaining 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, or forced or compulsory labour.

Escalation and Remediation of Modern Slavery Concerns

Sefas has established a dedicated modern slavery escalation and remediation pathway to ensure that any actual or suspected instances of modern slavery are addressed promptly, responsibly, and effectively.

Reporting and Escalation

All employees, contractors, and business partners are encouraged to raise concerns if they suspect modern slavery or human trafficking within our business operations or supply chains. Concerns may be reported through line management, Human Resources, Procurement, or via the Sefas Whistleblowing Policy. Reports may be made confidentially and, where permitted, anonymously.

All reported concerns will be escalated appropriately to relevant senior management and specialist functions, including Compliance and the UK Board of Directors where necessary, depending on the severity and potential impact of the issue.

Investigation

All allegations and concerns will be taken seriously and assessed in a timely, fair, and confidential manner. Investigations will be conducted by suitably trained personnel and may involve external experts where appropriate. The primary focus of any investigation will be the protection and wellbeing of potentially affected individuals.

Remediation and Corrective Action

Where modern slavery risks or incidents are identified, Sefas is committed to working collaboratively with relevant stakeholders to implement appropriate remediation. This may include:

- Taking immediate action to safeguard affected individuals

- Requiring suppliers or business partners to implement corrective action plans within agreed timeframes
- Providing or facilitating access to support services where appropriate
- Terminating relationships with suppliers or partners where remediation is not possible or where cooperation is refused
- Reporting to relevant authorities where legally required

Remediation efforts will prioritise preventing further harm and reducing the risk of recurrence.

Protection from Retaliation

Sefas will not tolerate retaliation against any individual who raises a concern in good faith. Any retaliation will be treated as a serious disciplinary matter.

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 of this policy by:

- Ensuring that staff involved in procurement and recruitment receive training on modern slavery and ethical employment practices
- Ensuring staff involved in procurement are aware of and follow modern slavery guidance published on GOV.UK
- Raising general staff awareness of the Modern Slavery Act 2015 and the action to take if they suspect slavery or human trafficking
- Including modern slavery risk and prevention considerations in relevant policy reviews
- Ensuring procurement strategies and contractual terms include references to modern slavery and human trafficking
- Continuing to enforce a zero-tolerance approach to modern slavery

Governance and Accountability

The UK Board of Directors holds overall responsibility for implementing this policy and its objectives and will ensure that appropriate resources, including training, are available to support its effective implementation. Sefas may terminate any agreement or arrangement with individuals or organisations working on our behalf if they breach this policy.

Any employee who breaches this policy may face disciplinary action, up to and including 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.



Samantha Ashwell
Director
Sefas UK
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