



South Staffordshire Plc

Modern Slavery, Human Trafficking and Human Rights Policy

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Introduction

South Staffordshire Plc and its subsidiary companies (together “the Group” and each a “Group Company”) maintain the highest standards of ethical behaviour in all of our business dealings. We are committed to conducting ourselves fairly, honestly and lawfully in all business dealings and relationships. We have a zero tolerance to modern slavery, human trafficking or human rights violations in the Group or within any part of its supply chain.

The Group is bound by the laws of the UK, including the Modern Slavery Act 2015 (as amended) which governs our conduct both in the UK and worldwide. We are committed to upholding all laws relevant to countering modern slavery, human trafficking and human rights violations in all the jurisdictions in which we operate and taking steps to ensure that modern slavery, human trafficking and human rights violations are not taking place in any part of our supply chain or in any part of our Group.

Purpose

The purpose of this policy is to state the Group’s position on and to provide information and guidance on recognising and dealing with modern slavery, human trafficking and human rights violations. This policy:

- sets the minimum requirements and procedural steps that all Group Personnel must follow in order to comply with this policy. Each jurisdiction may impose additional, more onerous requirements to meet their local obligations but cannot reduce the requirements of this policy; and
- provides information and guidance to those working for the Group on how to recognise and manage modern slavery, human trafficking, and human rights violations.

Scope

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, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located (“Group Personnel”). It is the responsibility of Group Personnel to ensure that are acquainted with this policy and any subsequent updates.

In this policy, third party means any individual or organisation you come into contact with during the course of your work and includes actual and potential clients, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Employees whose responsibilities relate to the sourcing of parts, components, and materials are informed and are expected to assist our compliance with these requirements, associated legislation, and regulations.

Our Vision, Mission and Values

Our commitment in terms of compliance with the Modern Slavery Act 2015 (as amended) and all laws relevant to countering modern slavery, human trafficking and human rights violations in all the jurisdictions in which we operate is also supported by our Group Vision, Mission and Values. Our core values and the values driven behaviour that applies to the Group and to all of our employees. In this way, all the parties involved know what they can expect from the Group and conversely what the Group expects of them.

One of our core values is “trusted”. Applying “trusted” to our relationships and dealings with our partners and suppliers means that we expect high ethical standards from our employees and our whole supply chain. This is the only way we can maintain our integrity and remain worthy of the trust placed in us by shareholders, investors, clients and customers. Operating our businesses ethically and sustainably and complying with the



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Modern Slavery Act 2015 (as amended) and all laws relevant to countering modern slavery, human trafficking and human rights violations in all jurisdictions in which we operate is key in our daily activities.

Policy

Definitions

Supply Chain

Entities with which has a direct or indirect business relationship and which either:

- supply products or services that contribute to the Group's own products or services or
- receive products or services from the Group.

Due Diligence

Due diligence in the context of human rights comprises an ongoing management process designed to support the organisation in meeting its responsibility to human rights. A human rights due diligence process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are addressed.

The Group will conduct human rights due diligence across its operations, supply chain, and business relationships, including subcontractors, service providers, and other third parties. This process will help identify and mitigate risks related to modern slavery and human trafficking beyond direct supplier

Human Rights Risk

Any risks that a business's operations may lead to one or more adverse human rights impacts.

Adverse Human Rights Impact

An adverse impact occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. A human rights impact may be actual or potential. Adverse impacts may be caused by the Group through its own activities; may be contributed to the Group either directly or indirectly through an outside entity or may be caused by someone with whom the Group does business and is linked to the Group's own operations, products or services.

Worker

Workers include direct employees, temporary workers, migrant workers, student workers, contract workers, and any other person(s) providing labour and employment services to Group Companies in the supply chain.

Our Expectations

We expect our suppliers not to be involved in forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or trafficking of persons of any age at any tier of the supply chain. This includes transporting, harbouring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. Suppliers, as employers or agents, may not hold or destroy employees' identification or immigration documents, such as government-issued identification, passports, or work permits, unless the holding of work permits is required by law.

Where modern slavery risks are identified, the Group will work with suppliers to implement remedial actions, including corrective action plans, training programs, and supplier audits where necessary. In cases of persistent non-compliance, the Group may reconsider supply arrangements and take appropriate actions, up to and including contract termination

Employers may not restrict workers' freedom of movement in the facility or entering or exiting company-provided facilities. All work must be voluntary, and workers shall be free to terminate their employment and



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leave work at any time. Employers and agents may not use misleading or fraudulent practices during the recruitment of employees. As part of the hiring process, workers must be provided with a written employment agreement that contains a description of terms and conditions of employment and the hazardous nature of the work. Workers must not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

We expect our suppliers to have a compliance plan in place to ensure that human trafficking and forced labour are not used and that risks of worker exploitation are mitigated. We will continue to promote and encourage our suppliers to take steps to ensure that modern slavery, human trafficking and human rights violations are not taking place in any part of our supply chain or in any part of their businesses. We expect our suppliers to conduct due diligence on their respective supply chains and to assist us with our compliance with these rules.

To the extent that a supplier refuses to cooperate with our compliance efforts, we may reconsider our supply arrangement and implement remedies available to us.

Human Rights Principals

Labour

- Prohibits the use of forced, bonded, indentured or involuntary prison labour.
- Employs workers who are at least 16 years old. We do, however, want to give work experience to young people and will continue to do this in a professional, caring, and appropriate way.
- Seeks to clarify our suppliers' position with regard to child labour and would endeavour to make sure that any young person is being managed, paid and treated appropriately.
- Ensures that where employees have contact with young people through our client network, we carry out the appropriate DBS checks.
- Sets work hours to comply with local law.
- Complies with applicable wage laws, regulations, and relevant collective bargaining agreements, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Maintains workplaces free of physical or mental harassment and abuse.
- Maintains workplaces free of unlawful discrimination and harassment in all of its forms, including that related to race, gender, sexual orientation, age, pregnancy, caste, disability, union membership, ethnicity, religious beliefs or any other factors protected by law.
- Encourages open communication and direct contact between workers and management.
- Respects the special needs of individual employees, including those who are pregnant or are returning to work after childbirth.
- Respects employees' rights to privacy of their personal information.

Health and Safety

- Minimises worker exposure to potential safety hazards through proper design, engineering and administrative controls, preventive maintenance and safe work procedures. Provides and properly maintain machine safeguards, interlocks and barriers. Workers are not to be disciplined for raising safety concerns.
- Maintains appropriate emergency plans and response procedures.
- Manages, tracks and reports occupational injuries and illnesses.
- Provides clean toilet facilities, and access to potable water and sanitary food preparation and storage facilities.
- Strives to continuously improve health and safety performance in all of its operations.



Environmental

- Minimises adverse effects of our operations on the community and environment, while safeguarding the health and safety of the public.
- Acquires, maintains, and complies with the appropriate environmental permits, registrations, and law.
- Implements programs to conserve water and energy and reduce waste.
- Identifies and manages potentially hazardous materials used in our operations to ensure safe handling, movement, storage, recycling or reuse, and disposal of such materials.
- Monitors, treats, and controls air emissions, wastewater, and waste as required prior to discharge or disposal.
- All manufacturing facilities are expected to adopt a management system compliant with ISO 14001 that promotes continuous improvement and compliance with applicable laws, regulations and contract requirements.

Governance

- Prohibits corruption, extortion and embezzlement, bribery, or other means of obtaining undue or improper advantage.
- Properly protects business information, customer information, and intellectual property rights in accordance with applicable laws, regulations, and business requirements.
- Appropriately protects employee and supplier "whistleblower" confidentiality and prohibits retaliation for reporting violations.
- Minimises adverse effects of our operations on the community and environment, while safeguarding the health and safety of the public.
- Acquires, maintains, and complies with the appropriate environmental permits, registrations, and law.

Group Companies Responsibilities

Each Group Company is responsible for establishing practices and procedures to ensure compliance with this policy and must:

- each Group Company is responsible for ensuring compliance with this policy, including producing and publishing an annual Modern Slavery Statement in line with UK Government requirements. Failure to comply with these obligations may result in enforcement action, including financial penalties or other regulatory consequences as mandated by law
- carry out risk assessments and implement actions identified.
- include training on this policy in employee inductions and provide further training as appropriate.
- develop supplier codes of conduct or supplement existing supplier codes of conduct.
- carry out appropriate checks within their supply chains.
- include contractual obligations in purchase and supply contracts prohibiting Modern Slavery, Human Trafficking and / or Human Rights violations and requiring third parties to comply with this policy and.
- communicate this policy to employees and external third parties.
- terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

How to raise a concern

If you have a concern or believe or suspect that modern slavery, human trafficking and / or human rights violations are taking place in any part of the Group's business or the supply chains of any supplier or believe or suspect that a breach of this policy has occurred or may occur, you should notify your line manager, Group Legal or HR Team. Reports will be handled in accordance with the Group's Whistleblowing Policy, ensuring



anonymity and protection from retaliation. You should not approach or accuse individuals directly or attempt to investigate the matter yourself.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chains operating in each Group Company constitutes modern slavery, human trafficking or human rights violations please contact Group Legal or HR Team.

Protection

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The Group is committed to ensure that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

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 your line manager, Group Legal or the HR Team. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Policy and Procedure.

Training

Mandatory training on this policy will form part of the induction process for all new employees. All existing employees, workers and temporary employees will receive mandatory training and regular, relevant updates on how to implement and adhere to this policy as appropriate. Board members will receive training on this policy as part of their induction programme.

Responsibility for this Policy

South Staffordshire Plc's Board of Directors has approved and issued this policy as part of its overall responsibility for ensuring that South Staffordshire Plc and each Group Company complies with its legal and ethical obligations, and that all those under its control comply with this policy.

Management, at all levels, are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

All Group Personnel must read, understand, and comply with this policy.

Disciplinary or other Action

Violations of this policy may result in disciplinary action, which could result in dismissal for gross misconduct.

The Group will not discharge, demote, suspend, threaten, harass or in any manner discriminate or retaliate, directly or indirectly, against Group Personnel who, in good faith, report suspected misconduct to the Group or participate in any investigation of suspected misconduct, even if the facts alleged are not confirmed by subsequent investigation. Failure to report known or suspected wrongdoing of which Group Personnel have knowledge, or making a report other than in good faith, may subject Group Personnel to disciplinary action, up to and including termination.

We reserve our right to terminate our relationships with third parties' if they breach this policy.



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Any queries on the application or interpretation of this policy as it applies to Group Personnel should be discussed with the Human Resources Department prior to any action being taken. Please email: peopleteam@south-staffordshire.com

Related Policies

This policy must be read in conjunction with the Grievance Policy.

Management and Administration

This policy does not form part of an employee's contract of employment, and it may be amended at any time.

The General Counsel & Company Secretary will be responsible for the management of this Policy and has final authority over this Policy.

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Questions regarding this policy should be directed to Group Legal using the following email address legalservices@south-staffordshire.com

Group Legal Team has the responsibility for ensuring the maintenance, review and update of this policy. Suggested changes / amendments should be submitted via email to: legalservices@south-staffordshire.com. Any review, update or changes to this policy shall be carried out and approved in accordance with South Staffordshire Plc policy and procedure review process.

Document Details

Owner: Group Legal
Approved By: Group Board
Signed By: Charley Maher, CEO

Signature:

Date of Approval: March 2025

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1.0	GL-001	14/03/2024	01/04/2025	Group Legal and HR	Published
2.0	GL-001	12/03/2025	01/04/2027	Group Legal and HR	Compliance-focused wording additions and changes in Due Diligence, Our Expectations, Group Companies Responsibilities and How to Raise a Concern Sections