

## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

### 1. Policy Statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and ensuring prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

We expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, at all levels and grades, including directors, senior managers, employees (whether permanent, fixed-term or temporary), agency workers, trainees, agents, contractors, external consultants, third-party representatives and business partners, or any other person associated with us. (referred to as "workers" in this policy).

### 2. Responsibility for the Policy

2.1 The Tappex Group Chief Executive has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Chief Executive has primary responsibility for implementing this policy and monitoring its use and effectiveness across the Group. Each trading company Managing Director / General Manager will have the primary and day to day responsibility within their respective businesses for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, maintaining all required records, and identifying and reporting any incidents which may contravene the Group Policy to their management team and to the Chief Executive.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training as appropriate.

2.4 Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

### 3. Compliance

3.1 You must ensure that you read, understand and comply with this policy.

3.2 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.

3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you should raise this with your immediate Supervisor.

Concerns may also be reported by following the procedure set out in the Company Handbook, which can be obtained from your line manager, Group HR or the Group Company Secretary.

3.4 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 or may be taking place in any part of our own business or in any of our supply chains.

#### 4. Communication

4.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 5. Breach of the Policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.



Mr T. Barnsdale.  
Tappex Group  
Chief Executive.