DANBRO

Anti-Slavery And Human Trafficking Policy

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Contents

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1.0 Policy Statement

2.0 Modern Slavery Definitions

3.0 Our Commitment

4.0 Supply Chains

5.0 Responsibilities

6.0 Due Diligence Process

7.0 Compliance With This Policy

8.0 Breaches Of This Policy

9.0 Monitoring and Review

1.0 Policy Statement

This policy applies to all persons working for the Danbro Group or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, contractors, external consultants, third party representatives and business partners.
The Danbro Group is committed to upholding the highest standards of ethical conduct and responsibility in all aspects of our operations. This Anti-Slavery and Human Trafficking Policy reflects our dedication to combatting modern slavery and human trafficking in all its forms.

2.0 Modern Slavery Definitions

Modern Slavery is a crime and a violation of fundamental human rights and takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. 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.

- **Modern Slavery:** The exploitation of individuals through coercion, deception or abuse of power for personal or commercial gain
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of persons through force, fraud, or coercion for the purpose of exploitation
- **Exploitation:** Any form of abuse, including forced labour, servitude, slavery or practices similar to slavery, debt bondage or the removal of organs

3.0 Our Commitment

The Danbro Group is committed to:

- Zero tolerance towards modern slavery and human trafficking in all its forms
- Conducting business ethically and with integrity
- Collaborating with stakeholders to prevent and address instances of modern slavery and human trafficking
- Providing training and resources to raise awareness and enhance understanding of modern slavery and human trafficking issues

4.0 Supply Chains

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 as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

5.0 Responsibilities

- **The Board of Directors:** The Board of Directors are responsible for setting the tone and culture of the organisation, ensuring compliance with this policy and providing necessary resources to support anti-slavery efforts
- **Employees:** All employees are expected to adhere to this policy, report any concerns related to modern slavery or human trafficking and cooperate with investigations as needed
- **Suppliers and Partners:** Suppliers and partners are required to adhere to the principles outlined in this policy and implement their own measures to prevent modern slavery and human trafficking within their operations

6.0 Due Diligence Process

We have set up an action group in order to ensure our processes continue to comply with the Modern Slavery Act (2015). Following which we have introduced the following due diligence process:

- Regularly reviewing our systems and processes to ensure employee and client information is secure, accurate and auditable
- Conduct regular risk assessments to identify potential areas of vulnerability to modern slavery and human trafficking within our operations and supply chain
- Identifying those who may be vulnerable and checking on them. Our risk indicators include anyone:
    - Residing in a house with 2 or more other contractor employees;
    - Paid below a certain amount per hour
- Reviewing and updating our agreements and contracts with suppliers ensuring that they are also committed to the abolishment of slavery and trafficking by ensuring compliance in their own business and subsequent supply chain
- Ensuring that all employees are paid at least the National Minimum Wage or National Living Wage and NEVER working with businesses who try to avoid this
- Compliance with Agency Workers Regulations which seeks to ensure no worker is paid less than a comparable directly employed individual doing a similar role
- Updating our Anti-Money Laundering checks in line with new legislation which includes:
    - 2017 Money Laundering Regulations
    - 2002 Proceed of Crime Act (POCA) as amended by the Criminal Finances Act 2017
    - Terrorism Act 2000 as amended by the Anti-Terrorism, Crime and Security Act 2001
    - Other anti-terrorism legislation

7.0 Compliance With This Policy

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You must notify us as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are also encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chain as soon as possible. You can do this by contacting either of the following as appropriate:

Danbro's Customer Experience Team on **01253 600 140**

The Confidential Modern Slavery Helpline on **0800 0121 700**

You can also make disclosures in line with our Whistleblowing Policy, available to view on our website.

8.0 Breaches Of This Policy

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

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

9.0 Monitoring and Review

This policy will be reviewed annually to ensure its continued relevance and effectiveness in preventing and addressing modern slavery and human trafficking. Amendments may be made as necessary to reflect changes in laws, regulations, or best practices.