

## Anti-Slavery and Human Trafficking Policy

### Policy Statement

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.

**MMES 2012 LIMITED** has 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. **MMES 2012 LIMITED** is also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

**MMES 2012 LIMITED** expects the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for **MMES 2012 LIMITED** 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. This policy does not form part of any employee's contract of employment and **MMES 2012 LIMITED** may amend it at any time.

### Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

**MMES 2012 LIMITED** employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Human Resources Manager.

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## Compliance with the Policy

**MMES 2012 LIMITED** employees must ensure that they read, understand and comply with this policy. 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.

**MMES 2012 LIMITED** employees must notify their manager or the Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

**All MMES 2012 LIMITED** employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If any **MMES 2012 LIMITED** employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If any **MMES 2012 LIMITED** employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with their manager or the Human Resource Manager.

**MMES 2012 LIMITED** aims 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. **MMES 2012 LIMITED** is committed to ensuring no one suffers any detrimental treatment because 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If they believe that they have suffered any such treatment, they should inform the General Manager immediately.

If the matter is not remedied, and they are an employee, they should raise it formally using the **MMES 2012 LIMITED** Grievance Procedure.

## Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for **MMES 2012 LIMITED** and regular training will be provided as necessary.

**MMES 2012 LIMITED** 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.

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## Breaches of this Policy

Any **MMES 2012 LIMITED** employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. **MMES 2012 LIMITED** may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. This policy statement will be subject to regular review and amendment as often as may be appropriate.

Signature of company representative.

Name: Michael Morgan (Director)

Date: 20/2/2024

Signature: 

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