

POLICY DOCUMENT.

Anti-Slavery and Human Trafficking Policy.

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1.0 Purpose

The Company has a zero tolerance approach to modern slavery. It is committed to acting ethically, and with integrity and transparency in all of its business dealings and relationships, consistent with its obligations under the Modern Slavery Act 2015.

This Policy provides guidelines for Bako North Western's Senior Management team, enabling them to implement and enforce effective systems and controls, to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business, or in any of its supply chains.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery. It expects that its suppliers will, in turn, hold their own suppliers to the same standards.

2.0 Scope

The Bako North Western (Group) Directors have directed that this Policy document be established and maintained in all subsidiary sites within the Group, to ensure that a consistent approach is maintained by all levels of management when implementing this Policy. It shall be adopted by Bako North Western's Senior Management Team accordingly.

This Policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, Directors, officers, agency workers, suppliers, contractors, consultants and business partners.

3.0 References

Employment Manual Document - EM013 Equal Opportunities & Dignity at Work Policy.

The Five Star Occupational Health & Safety Management accreditation.
Investors in People.

Both the above accreditations are held by Bako North Western Ltd.

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4.0 Policy Requirements.

4.1 POLICY STATEMENT

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.

In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

4.2 COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company, or under the Company's control. All Bako North Western's staff are required to avoid any activity that might lead to a breach of this Policy.

If any staff member believes or suspects a breach of, or conflict with this Policy has occurred, or may occur, they must notify their line manager, or report it in accordance with the Company's Whistle Blower's Policy. All staff are encouraged to raise concerns about any issue or suspicion of modern slavery, in any part of the Company's business or supply chains as soon as possible. If they are unsure about whether a particular act, the treatment of workers, or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager immediately. They may also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting, in good faith, their suspicion that modern slavery is, or may be taking place in any part of its business or in any of its supply chains.

4.3 BREACH OF THIS POLICY

Sanctions for breach of the policy shall be clearly set out and shall include either:

- Disciplinary action or dismissal, if the breach is by a member of staff.
- Termination of the contract if the breach is by a supplier, contractor or other business partner.

Any employee who breaches this Policy shall face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this Policy and/or are found to have been involved in modern slavery.

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5.0 Staff Responsibilities.

Bako North Western's Senior Management Team has joint day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and auditing internal control systems and procedures, to ensure they are effective in preventing or remediating the risk of modern slavery. They shall also be responsible for investigating allegations of modern slavery in the Company's business or supply chains.

6.0 Training & Competence.

Regular training on this Policy, and on the risk that the business faces from modern slavery in its supply chains, shall be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery shall be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them

7.0 Legal Requirements.

The Company shall ensure that all legal requirements associated with this document are communicated to, and fully understood by all Managers implementing this Policy.

8.0 Audits & Risk Assessments

This Policy shall be subject to internal and external audit on a regular basis.

9.0 Communication

Line managers shall be responsible for ensuring that those reporting to them understand and comply with this Policy.

The Company shall communicate information relevant to this Policy via Works Instructions and briefings throughout all levels of the business in the following ways:

- Management Review Meetings.
- Staff Briefing Meetings.
- Job Descriptions.

Changes to these Procedures.

From time to time, there may be a need to change the above procedures with regard to new employee agreements, changes in legislation or changes in business. All employees shall be consulted and informed, should there be a need to amend or update.

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