

MODERN SLAVERY POLICY

This policy outlines our commitment to actively prevent and combat modern slavery within our operations and supply chain.

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1. Policy Details

1.1. Purpose

This document outlines the policy of Heresafe Limited in relation to Modern Slavery.

1.2. Scope

All internal operations and employees.
Heresafe's supply chain.

1.3. Principle

Heresafe is committed to preventing Modern Slavery within our operations and our supply chain.

1.4. Policy Statement

The UK Modern Slavery Act 2015 creates offences and imposes a duty on businesses supplying goods and services in the UK to report each year on the steps they have undertaken to ensure their operation and supply chains are free of human trafficking and slavery. Other countries have similar laws and requirements. Heresafe Limited does not have an annual turnover of £36 million from the provision of goods and services (as set out in the Act) and therefore is not required to make a modern slavery statement under the Act, although this policy sets out our commitment to ethical trading practices and outlines the actions Heresafe is taking to tackle modern slavery and human trafficking in our business and supply chain.

Heresafe is committed to supporting human rights within our own organisation and within its external supply chain. Heresafe expects its suppliers to comply with all applicable regulations and laws. Heresafe fully supports the intent of the UK's laws and opposes human trafficking and slavery in all forms.

As part of our initiative to identify, assess and mitigate risks:

- Heresafe uses a risk-based assessment process for evaluating, verifying, and selecting direct suppliers.
- Heresafe expects its suppliers to abide by all applicable laws and regulations and maintain the highest ethical standards.
- Heresafe continues to assess and evaluate its supply chain's responsible sourcing practices.
- Heresafe strives to enforce best practices in our supply chain and within the entirety of the organisation.

1.5. Relevant Policies

The following policies are relevant to monitor and reduce the risk of modern slavery occurring within our business or its supply chain:

- Supplier Diversity

2. Policy Compliance

2.1. Compliance Measurement

The information security management team will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

2.2. Exceptions

Any exception to the policy must be approved and recorded by the Information Security Manager in advance and reported to the Management Review Team.

2.3. Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

2.4. Continual Improvement

The policy is updated and reviewed as part of the continual improvement process.

3. Version History

Version	Date	Author	Notes
1.0	31/10/2018	Phil Atkinson	Creation of Modern Slavery Policy
2.0	30/09/2019	Josh Henighan	Full review and update.
2.1	20/03/2023	April Waddington	Noted exemption from issuing an annual statement.
3.0	24/02/2025	Daryl Greensill	Change to Heresafe branding and new template.