



# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Modern slavery is a crime and morally reprehensible act that deprives a person's liberty and dignity for another person's gain. Millions of people around the world, including many in developed countries are being kept and exploited in various forms of slavery.

Our policy is that our directors, employees, and stakeholders are fully committed to preventing slavery and human trafficking in our operation and supply chain. We take action to understand all potential modern slavery risks related to our business and to implement steps to prevent any form of slavery and human trafficking.

At the current date, we have not identified any risks or been made aware of any allegations of human trafficking/slavery activities against our Company, our customers, or our suppliers. If we were, we would act immediately and take any remedial action needed within our resources or against the third party and report it to the relevant authorities.

## Our Business and Supply Chain

- Trustseal and its business activities.
- Countries/locations where it operates.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, and environmental standards.

## Risk Assessment Procedures

We conduct risk assessments of our supply chain by considering:

- The risk profile of individual countries based on the Global Slavery Index.
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups.
- New analysis and the insights of labour and human rights groups.

The assessment will determine our response and the risk controls that we implement.

## Policies

We operate the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy – we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Business Ethics and Conduct Policy – our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour in our operations and in managing our supply chain.
- Purchasing Code – we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

## Supplier Due Diligence

We conduct due diligence on all new suppliers and existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of services or particular suppliers in vulnerable sectors.
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to confirm that:

- They do not use any form of forced compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They do not require employees to post a deposit/bond and do not withhold their salaries for any reasons.
- They do not require employees to surrender their passports or work permits as a condition of employment.

## Awareness and Promotion

We have raised awareness of modern slavery by issuing this policy to all employees, suppliers and customers confirming.

- Our commitment to the fight against modern slavery
- Risk assessments to identify potential cases of slavery or human trafficking.
- Our commitment that employees should report suspicions of modern slavery.
- Issuing our policy and explaining the procedures in any Induction programme.

## Measuring How We Are Performing

We have a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include annual reviews: -

- Checking that employees have completed mandatory training.
- Checking how many suppliers have filled out our ethics questionnaire.
- Checking that reports have been made by our employees that indicate their awareness of ethical issues.

Issued by Jon Wragg Position Director

Signature

