



Anti-Slavery & Human Trafficking Policy

Introduction

Beck & Pollitzer Limited and its subsidiaries ("the Company") maintains relationships with many different organisations in its supply chain as well as employing directly large numbers of people. Following on from the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and the risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of the business or in its supply chains.

We expect all or who have, or seek to have, a business relationship with the Company, to familiarise themselves with our anti-slavery policy and to always act in a way which is consistent with its values. Zero tolerance is at the core of the Company's Anti-Slavery Policy.

This policy also applies to:

- All employees, officers, and directors of the company.
- Contractors, agency workers, consultants, and business partners.
- Suppliers, subcontractors, and other third parties acting on behalf of the company.

1. Purpose of this Policy

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the 'Act'). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking within our operations and supply chains, 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. This document sets out the policy of the Company with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act.
- 1.2 The Company has a zero-tolerance approach to all forms of modern slavery, forced labour and human trafficking. Beck & Pollitzer is committed to conducting its business with integrity, transparency, and respect for human rights in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere within our Company or those of its suppliers.

2. Steps for the prevention of modern slavery

- 2.1 The Company is committed to ensuring there is transparency in its own business and in our approach to tackling modern slavery throughout its operations and supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.
- 2.2 Modern slavery includes:
 - 2.2.1 Forced Labour – any work or service performed involuntarily under threat of penalty.
 - 2.2.2 Debt bondage – Where work is demanded as repayment of a debt.
 - 2.2.3 Human trafficking – The recruitment, transport, or harbouring of people for exploitation.
 - 2.2.4 Child labour – Work that deprives children of their childhood, education, or is harmful to their health and development.
- 2.3 The Company expects the same high standards from all its contractors, suppliers and other business partners, and the Company is evolving and updating our contracting processes to include specific prohibitions against the used force, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Company expects its suppliers to hold their own suppliers to the same high standards.
- 2.4 All employees have an obligation to familiarise themselves with the Company's procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.
- 2.5 Whilst recognising the Company's statutory obligation to set out the steps it should take to ensure that modern slavery and human trafficking is not taking place in its operations and supply chains, the Company acknowledges that it does not control the conduct of individuals and organisations in its supply chains. To underpin its compliance with practical steps, the Company intends to implement the following measures:

- I. Conduct risk assessments to determine which parts of the business and which of the Company's suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- II. Engage with the Company's suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- III. Where appropriate, as informed by the Company's risk assessment, seek to introduce further supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- IV. Introduce contractual provisions for the Company's suppliers to confirm their adherence to this policy and accept the Company's right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- V. At the end of the financial year the Company will include in the director's report accompanying its annual financial statements a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on the Company's website during the course of 2025.

3. Our Responsibilities

- 3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring compliance of this policy and its implementation complies with its legal and ethical obligations.
- 3.2 Managers and Team Leaders 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 and human trafficking.
- 3.3 Employees must read, understand, and comply with this policy and raise concerns where appropriate.
- 3.4 We are committed to:
 - 3.4.1 Ensuring fair and ethical recruitment practices, free from coercion and deception.
 - 3.4.2 Prohibiting retention of identity documents or recruitment fees by our company or any third party acting on our behalf.
 - 3.4.3 Paying all employees and contractors fairly, in line with local laws and international standards.
 - 3.4.4 Ensuring safe and humane working conditions across all project sites and offices.
 - 3.4.5 Conducting due diligence to identify and mitigate risks of modern slavery in our operations and supply chain.

4. Actions to report modern slavery or human trafficking

We encourage employees, contractors, and external stakeholders to report any concerns regarding modern slavery or unethical behaviour through our confidential channels:

Whistleblowing procedure – direct access to senior leadership

The Company's Whistleblowing Policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or its suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found on the company website under policies.

In summary, in the first instance, and unless the worker reasonably believes his/her line manager to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach his/her line manager, any concerns should be raised with the workers line manager. If he/she believes the line manager to be involved, or for any reason does not wish to approach the line manager, then the worker should proceed straight to reporting via the whistleblowing hotline. The company will investigate concerns promptly and take appropriate action.

Suspicious activity confidential feedback email

The whistleblowing hotline which can be accessed via a toll-free number or online portal. (see local "Speak-up" posters for the QR code and local toll-free number), may be accessed by the employee/contractor or any other person wishing to raise a concern. Reports can be made confidentially via the Company's Whistleblowing process. You should notify the company in any of the following circumstances: You suspect a person acting on behalf of the Company is seeking to exploit another in a way which could amount to modern slavery or human trafficking.

- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery or human trafficking.
- You have received an approach from a person acting on behalf of the Company who has invited you to participate in acts which could result in offence under the Modern Slavery Act 2015 being committed.

Any reports to the whistleblowing hotline/ online portal are kept in confidence, subject to the need for the Company to act responsibly and within the law. The source of reports to the hotline/ online portal will be kept confidential, save to the extent that maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with the Company maintaining adequate procedures for the prevention of modern slavery being committed on its behalf or in any element of its supply chain.

Direct communication

The Company encourages members of the public or people not employed by us to report to the hotline/online portal, or to raise any concern, issue, or suspicion of modern slavery in any part of our business or related supply chain.

5. Breaches of this Policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 5.2 We will terminate our relationship with other individuals and organisations working on our behalf if they materially breach this policy.
- 5.3 For Suppliers and contractors, breaches may result in termination of contract.

6. Safeguards

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if the turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

7. Communication and awareness of this Policy

The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of the Company's business relationship with them and reinforced as appropriate thereafter. In addition, all senior leadership within the Company receive awareness training and must fully comply with the policy wherever they are based globally.

8. Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published no later than the publication of our financial results.



Simon Harris
Group Chief Financial Officer