

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

CONTENTS

1. PURPOSE	3
2. SCOPE	3
3. COMPLIANCE WITH THE POLICY	3
4. COMMUNICATION AND AWARENESS.....	3
5. BREACHES OF THIS POLICY	3
6. RESPONSIBILITIES	4
7. ACCIDENT INVESTIGATION.....	4
8. IMPLEMENTATION, MONITORING AND REVIEW OF THIS POLICY	4

1. PURPOSE

OUTCO adopts a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships. We enforce effective systems and controls to prevent modern slavery within our business and supply chains.

In line with the **Modern Slavery Act 2015**, we promote transparency in addressing modern slavery across our operations and supply chains. We expect all contractors, suppliers, and business partners to adhere to the same high standards, including specific prohibitions against forced, compulsory, or trafficked labor, and we require them to ensure their suppliers uphold these standards.

2. SCOPE

This policy applies to all employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. COMPLIANCE WITH THE POLICY

- Every employee is required to read, understand, and comply with this policy.
- Preventing, detecting, and reporting modern slavery in any part of our business or supply chain is the responsibility of all employees and those under our control. Avoid any activity that could lead to or suggest a breach of this policy.
- Notify your manager immediately if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Raise concerns at the earliest opportunity about any issue or suspicion of modern slavery within our business or supply chains at any supplier tier.
- If you suspect or know of a policy breach, notify your manager or report it via our [Whistleblowing Policy](#) without delay.
- If you are unsure whether certain actions, worker treatment, or conditions within any supply chain tier constitute modern slavery, consult your Line Manager or the Commercial Director.
- We encourage openness and will support anyone who raises genuine concerns in good faith, even if mistaken. We are committed to ensuring no one faces detrimental treatment—such as dismissal, disciplinary action, threats, or other unfavourable consequences—for reporting suspicions of modern slavery.
- If you experience detrimental treatment as a result of raising a concern, inform the HR Manager immediately. Employees who do not receive a resolution can formally address the issue through our [Grievance Procedure](#).

4. COMMUNICATION AND AWARENESS

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 us, and regular training will be provided as necessary.

Our 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.

5. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

6. RESPONSIBILITIES

- Commercial Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- SHEQ 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.
- Line managers 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.

7. ACCIDENT INVESTIGATION

Unless the accident is trivial,

8. IMPLEMENTATION, MONITORING AND REVIEW OF THIS POLICY

This policy will take effect from **01/06/2025**. The **Commercial & Compliance Director** have overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices. Any queries or comments about this policy should be addressed to the **Commercial & Compliance Director** or **Finance Director**.

Approved by:
Signature

Print Name

Title

Stephen Webb

Stephen Webb

Commercial & Compliance Director

Approved on: 01/06/2025
Review Due: 01/05/2026