



ANTI-SLAVERY POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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.
- 1.2 The Crownlea Group has a zero-tolerance approach to modern slavery and we are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers or any other people or bodies associated with the business.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal obligations, and that all those under our control comply with it.
- 2.2 The Anti-Slavery Policy Compliance Team (the 'Compliance Team') which comprises the Group Board will work together to ensure that this policy is maintained across all operational areas of the Group in accordance with evolving regulatory requirements and to ensure that any breaches or concerns are addressed.
- 2.3 The Group Financial Director has primary and day-to-day responsibility in relation to our supply chain for implementing this policy and 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.
- 2.4 The Group HR & Payroll Department has primary and day-to-day responsibility in relation to those directly employed by us for implementing this policy and 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.

3. COMPLIANCE WITH THE POLICY

- 3.1 All persons working for The Crownlea Group must ensure that they read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All

persons working for The Crownlea Group are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 3.3 All persons working for The Crownlea Group are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage, by reporting it in accordance with our Whistleblowing Procedure.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 This policy will be communicated to all Crownlea Group employees.

4.2 The Crownlea Group employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

5. DUE DILIGENCE

5.1 In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy. These will be kept under review by the Compliance Team.

6. BREACHES OF THIS POLICY

6.1 Any breach of this policy will generally be treated as gross misconduct and may result in dismissal without notice

6.2 We may terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

SIGNED:



Name: J Solesbury

Position: Director
For and on behalf of The Board

Date: 4 March 2019

Review Date: 4 March 2020