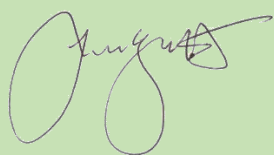




MODERN SLAVERY ACT POLICY STATEMENT

Financial year 2022/2023



Last Reviewed: 22/11/2023
Jamie Buttle, Managing Director

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1) Policy Statement

- This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out steps Stoneseed has taken and is continuing to take to understand and minimise the potential risk of modern slavery in its business and supply chains.
- Modern slavery is a crime and a 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.
- Stoneseed has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and 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.
- We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- As a service provider, Stoneseed operate a very small supply chain. Due diligence around modern slavery is carried out as part of the set up with a new supplier, and thereafter on an annual basis by obtaining and checking up to date modern slavery statements.
- 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, contractors, external consultants, third-party representatives and business partners.
- Employees responsible for managing suppliers and others involved with Stoneseed or our Clients are, themselves, responsible for ensuring that our values and ideals are upheld.
- This policy does not form part of any employee's contract of employment and we may amend it at any time.

2) Responsibility for the Policy

- The Stoneseed Senior Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The HR Manager has 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.
- Management 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 in supply chains.
- Any employee, contractor, client or business partner is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to hr@stoneseed.co.uk



3) Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

- The prevention, detection and reporting of modern slavery in any part of our business, client environment or supply chains, is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify your manager OR a company director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, client environment or supply chains at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or company director as soon as possible.
- You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business, client environment and supply chains.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or company director.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee of Stoneseed, you should raise it formally using our Fair Treatment and Grievance Procedure, which can be found in Stoneseed Policies and procedures handbook, available on the company intranet.

Training

We want to help our employees to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context.

We have highlighted the www.modernslavery.co.uk site and www.antislavery.org to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline.

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 organisations working on our behalf if they breach this policy.

