



## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

**We are committed to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.**

### **Our Commitment to Fighting Modern Slavery**

- We are committed to tackling modern slavery throughout our supply chains. As part of our contracting processes, we require all our contractors, suppliers and other business partners to sign and respect this Anti-Slavery and Human Trafficking policy, as well as our Human Rights and Community, and Health and Safety policies.
- 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, external consultants, third-party representatives and business partners.
- This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **Responsibility for the policy**

- The Board of Directors 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 Group Health & Safety Director 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. Contact details are at the end of this document.
- Local company managers are responsible for implementing effective internal control systems to prevent the occurrence of modern slavery in our business.
- 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.

- You are 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 the Group Health & Safety Director.

#### **Compliance with the policy**

- You must ensure that you read, understand and comply with this policy. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- If you believe or suspect that a conflict with, or breach of, this policy has occurred, or may occur in the future, you must notify the Group Health & Safety Director at the earliest stage possible. You can also use the whistleblowing process detailed in our Whistleblowing policy.
- 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 the Group Health & Safety Director.
- We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our own business or in any of our supply chains. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our whistleblowing procedure, which is detailed in our Whistleblowing policy.

#### **Communication and awareness of this policy**

- 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 commitment to address the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **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.

#### **Contact details**

- Contact **Health & Safety Director; Clint White** at [cjw@sigmaroc.com](mailto:cjw@sigmaroc.com)

*Revised and updated in March 2022*