

4.0 Anti-Slavery & Human Trafficking Policy

4.1 POLICY STATEMENT

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.

In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

4.2 COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company, or under the Company's control. All Bako North Western's staff are required to avoid any activity that might lead to a breach of this Policy.

If any staff member believes or suspects a breach of, or conflict with this Policy has occurred, or may occur, they must notify their line manager, or report it in accordance with the Company's Whistle Blower's Policy. All staff are encouraged to raise concerns about any issue or suspicion of modern slavery, in any part of the Company's business or supply chains as soon as possible. If they are unsure about whether a particular act, the treatment of workers, or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager immediately. They may also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting, in good faith, their suspicion that modern slavery is, or may be taking place in any part of its business or in any of its supply chains.

4.3 BREACH OF THIS POLICY

Sanctions for breach of the policy shall be clearly set out and shall include either:

- Disciplinary action or dismissal, if the breach is by a member of staff.
- Termination of the contract if the breach is by a supplier, contractor or other business partner.

Any employee who breaches this Policy shall face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this Policy and/or are found to have been involved in modern slavery.



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