

## Anti-slavery and Human Trafficking Policy

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## Version Control

Version	Date change(s) made	Change(s) made by	Summary of change(s)

## 1. Introduction

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, to exploit them for personal or commercial gain.

## 2. Policy statement

Bettys & Taylors Group is committed to ensuring that all workers employed by us, as well as those in our global supply chains, enjoy safe and fair treatment in their workplace. We have a zero-tolerance approach to modern slavery and we're committed to:

- acting ethically and with integrity in all our business dealings and relationships;
- 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
- ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our global supply chains.
- publishing a Slavery and Human Trafficking statement on our website for each financial year in line with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our suppliers and other business partners and expect that our suppliers will hold their own suppliers to the same high standards.

## 3. Who this policy applies to

This policy applies to all of our people, including directors, officers, agency workers, seconded workers, volunteers, interns, agents and contractors. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **4. Responsibility for this policy**

The Group Finance and Resources Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all of our people comply with it.

The HR, Sourcing and various Purchasing teams have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and reviewing our internal procedures to ensure they are effective in countering modern slavery.

Management at all levels of our business 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.

## **5. Compliance with this policy**

The prevention, detection and reporting of modern slavery in any part of our business, or our global supply chains, is the responsibility of all of our people. Please ensure that you avoid any activity that might lead to, or suggest, a breach of this policy.

We ask that you raise concerns about any issue or suspicion of modern slavery in any parts of our business, 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, please notify your manager, or report it in accordance with our Whistleblowing Policy, as soon as possible.

If you're 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. 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're committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

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

Please ensure that you communicate our zero-tolerance approach to modern slavery to all appropriate suppliers, contractors and business partners at the outset of our business

relationship with them and reinforce this approach as and when you consider it's appropriate to do so.

## **7. Breaches of this Policy**

We will take any breaches of this policy seriously and any employee who breaches this policy may face disciplinary action. We may decide to end our relationship with other individuals and organisations working on our behalf if any of their actions conflict with this policy.