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## Anti-Slavery and Human Trafficking Policy

### Overview of Act

The Modern Slavery Act 2015 came into effect in March 2015 and is the first of its kind in Europe. The legislation enhances the support and protection for victims of human trafficking and enslavement. Erith Holdings Limited and all its subsidiaries, collectively referred to as the Erith Group, is wholly supportive of the Act. This policy will be reviewed annually to ensure compliance is maintained.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor 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.

### Erith Policy Statement

During 2021/22, we will continue to monitor and record anti-slavery checks for all personnel working within our business at the point of induction, which we will also use to raise awareness at project level. In addition to this we will ensure that all labor supply contractors can demonstrate the robustness of their internal checks and that these satisfy our standards via a pre-qualification questionnaire prior to be permitted onto our supply chain. We will also review a sample of the supply chain to ensure that they have an active anti-slavery policy.

Going forward we aim to work with smaller members of our supply chain to ensure they are fully aware and compliant with the Modern Slavery Act.

### 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. 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.

### Procurement

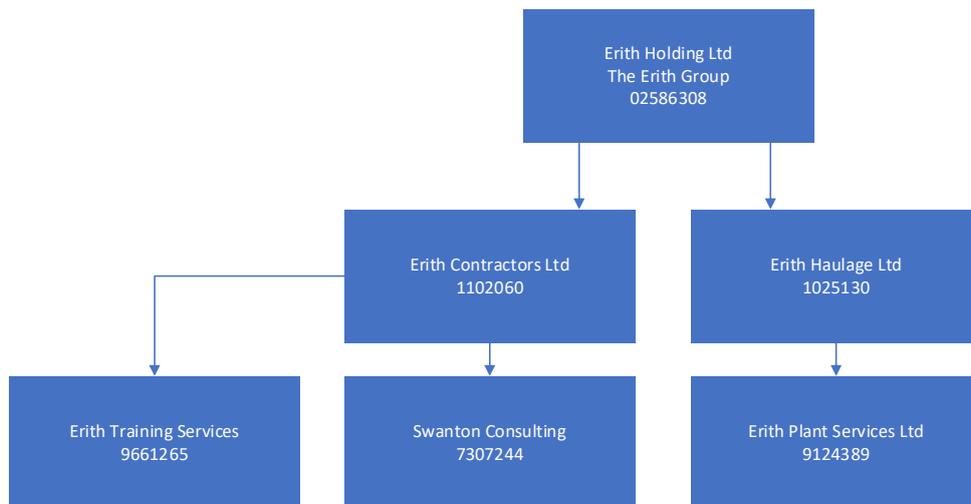
Procurement have a responsibility to ensure that the Pre-Qualification Questionnaire (PQQ) from suppliers is filled out with the relevant, requested information attached as required and that this information is kept up to date on the supply chain list on Ezone.

- The Erith Group, and all our subsidiaries, will not tolerate the use of forced or child labor in any of its operations.
- We do not tolerate the physical punishment, abuse or involuntary servitude of any worker.
- We expect all members of our supply chain to uphold the same standards.
- Should a member of our supply chain be involved in a breach of the Modern Slavery Act, the Erith Group will cease all business activity with that company, effective immediately.

### Erith Company Structure

All the companies under Erith Holdings Ltd, as illustrated in the Company Diagram, perform most of their work within the UK and Europe, and our policies apply to each of them without exception. Amongst them, our Corporate Social Responsibility, Equal Opportunities and Suspected Wrongdoing policies demonstrate the importance of ensuring our employees receive the duty of care that they deserve.

## Company Diagram



### Processes to Combat Trafficking and Slavery

We are committed to providing our staff with a salary which, as a minimum, meets the National Living Wage and offering the required statutory leave entitlement. Furthermore, we ensure all our staff have provided their National Insurance number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

By checking our employees' NI numbers or Working Visa's we know they are legally eligible to work in the UK, and that their salary will be monitored by HMRC.

Our Appraisal Questionnaire used for vetting our supply chain will inform us that the businesses with whom we conduct our operations with have taken equivalent steps.

### Ensuring Standards in our Supply Chain

Erith require all of suppliers and sub-contractors to complete an Appraisal Questionnaire. The answers from this questionnaire provide us with enough information that we are confident our entire supply chain upholds the same standards, principals and business ethics that we do. If we feel they do not reach our standards, or have progressively allowed their standards to lower, they will cease to be a business with whom Erith associate with.

### Training and Awareness

Erith utilise their own cloud-based intranet system known internally as Ezone. This system is continuously updated and alerts relevant employees when contracts and Working Visas are due to expire. Ezone is also used to share information instantaneously to all our employees, which means we can distribute awareness bulletins, advice, and guidance on a range of topics, including our stance against forced labor and human trafficking.

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.

**Signed for and on behalf of the Executive Board:**



**Steven Darsey**  
Company Chairman  
25/09/2021