

Anti-Slavery Policy

Menfor Group recognises that slavery does still exist in the modern world. We have developed our Anti-Slavery Policy in line with s.54 of the Modern Slavery Act 2015. The Anti-Slavery Policy sets out the steps and actions that Menfor has taken – and continues to take – to ensure that modern slavery or human trafficking has no part in our business or the supply chains we use.

Modern slavery takes many forms and there are many routes used to funnel people into work against their will for little or no pay. This can include:

- Physical and mental threats and mistreatment to force an individual into work
- Mental and/or physical abuse or the threat for control
- Dehumanisation and treating an individual as a commodity or property to be bought or sold for money
- Restrictions on movement and/or freedom

Menfor Group has a zero-tolerance approach to modern slavery in all its forms, and we are committed to acting with transparency and integrity in every project we undertake. We put a strong emphasis on ensuring effective controls and systems are in place to safeguard against modern slavery anywhere it might occur within our business or in our supply chain.

Fair Pay

As an organisation, Menfor Group promises to always ensure each and every employee is paid what they have earned, on time. We abide by minimum wage regulations and we have a strict zero-tolerance policy when it comes to breaches in these areas.

Our Policies

In order to ensure that Menfor Group is always conducting business on the most ethical and transparent grounds, we have a number of internal policies in place such as:

- **Anti-Slavery Policy:** This sets out Menfor Group's stance on modern slavery, giving employees insight into how they can identify any instances of slavery and where and how to access help if they have any concerns.
- **Recruitment Policy:** The organisation operates a robust recruitment policy which includes checks for eligibility to work in the UK for all prospective employees. This helps us safeguard against human trafficking and other instances where individuals might be forced to work against their will.
- **Code of Business Conduct:** This far-reaching code spells out how we behave as an organisation and how we expect our employees and suppliers to act with regards to modern slavery issues.

Our Suppliers

Menfor Group has a strong set of policies when it comes to the suppliers we work with and, as such, we maintain a Preferred Supplier List.

What this means is that we undertake thorough due diligence checks on all suppliers we work with before allowing them to become one of our preferred suppliers. This includes online research to ensure a supplier has no links with, or convictions for, offences related to modern slavery. Additionally, Menfor Group also conducts on-site audits to ensure our policies are met and to review working conditions.

Our Anti-Slavery Policy forms a core part of our supplier contracts, and they are required to confirm that no part of their business operations break the policy. Below is just a part of what we ask our suppliers to confirm:

- They have taken steps to eradicate modern slavery within their business
- They, in turn, hold their suppliers to account with regards to modern slavery
- UK-based suppliers remunerate their employees with at least the National Minimum Wage/National Living Wage
- If any evidence or instances of modern slavery comes to light, we may terminate the supplier contract at any time pending further investigation.

Training

We conduct regular and updated training sessions for our buying and procurement teams to ensure they understand the signs of modern slavery, and what to do if they suspect it is taking place within our organisation's supply chain.

How We Measure Performance

To ensure we have real, actionable feedback on our Anti-Slavery Policy, Menfor Group uses performance indicators to measure our current policy and inform our future policy decisions.

- Reports from employees feeding back on suspected modern slavery practices – and actioning with suppliers if necessary.
- Reviewing reporting figures on an annual basis to measure the effectiveness of policies and shape of future policies.
- Analysing which parts of the supply chain reports come from, using this data find the best partners and suppliers to work with in the fight against modern slavery.