

STANDARD PROCEDURE

Modern Slavery Annual Policy Statement

This statement commits The Martin Group of Companies to complying with section 54 of the Modern Slavery Act and reaffirms its commitment to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

The Martin Group supports the UK Government's commitment to eradicate the abuse and exploitation of workers, both in the UK and overseas and this statement will be published on the Group website and is signed by the Company Chairman to demonstrate the Board's collective commitment.

Our approach in relation to slavery and human trafficking means that we strive to maintain a productive and open dialogue with all parties who may have an interest in our activities including customers, suppliers and employees. We have an established programme to monitor supplier performance and actively encourage feedback from our employees to report any concerns directly.

The Board takes ultimate responsibility for monitoring this policy and is committed to developing and implementing appropriate initiatives set out below.

The Martin Group expects that all of its business is conducted in compliance with high ethical standards of business practice. We apply these standards to all dealings with employees, customers, suppliers and other stakeholders.

The Company supports the International Labour Organisation's Global Employment Agenda and fully complies with the international labour standards in relation to employment and ethical policy and has taken into account the UN Guiding Principles on Business and Human Rights.

The following actions will be implemented to support this policy:

- 1) Slavery and Human Trafficking will be considered and addressed in our approach to corporate social responsibility and reviewed on an annual basis.
- 2) All employees must have a written contract of employment setting out their terms and conditions in line with government requirements.
- 3) To ensure that any issues or concerns about slavery or human trafficking can be raised, the whistleblowing procedure will be made available to our employees who are encouraged and supported to report, in confidence any concerns.
- 4) Audits will continue be carried out to ensure that all our employees are paid at least the National Minimum Wage or Living Wage where applicable and have the right to work in the UK.
- 5) Line Managers will be trained to monitor and control working hours to ensure that excessive hours are not being worked and that overtime is paid at a premium rate.
- 6) Ensure that commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015 and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act.
- 7) Children must not be exploited or denied education and their health and safety must be protected at all times. Therefore children under the age of 16 shall not be recruited or employed.
- 8) There shall be no forced or involuntary labour of any description and suppliers shall allow their workers the rights to leave after giving reasonable notice.
- 9) Workers must not be expected to perform duties incompatible with their physical or mental abilities.
- 10) Suppliers must complete fully documented risk assessments of their sites and any accommodation provided and regularly monitor risks posed to workers' health and safety and assign a senior manager to be responsible for such matters.

- 11) Children and young people under 18 shall not be asked to work at night or carry out activities that are potentially hazardous or injurious to their health and development.
- 12) Training about slavery and human trafficking will be made available for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

The due diligence process that we carry out is designed to ensure that there is no slavery or human trafficking in our business or supply chain. This will include auditing external suppliers' terms and conditions of employment and giving up to date advice on employment legislation, verification of documentation and identification of free sources of advice and/or government support to encourage a culture of compliance with all legal obligations and protect the reputations of all concerned.

We have worked with our suppliers for many years to help them build sustainable businesses, commercially, ethically and environmentally and our CSR statement sets out our expectations of suppliers on issues such as pay, working hours, child labour and fair treatment at work.

An assessment of the effectiveness of the measures that we have taken to prevent such activity and the way we assess and manage the risks that are identified will include an audit of suppliers' management systems and records for delivering compliance.

Suppliers are expected to cooperate fully and to communicate their compliance with our standards across all workers, suppliers and sub-contractors engaged in their supply chain. Suppliers must also provide a mechanism for workers to report or discuss non-compliance confidentially.

The Group treats internal breaches of this policy with maximum seriousness and will investigate any potential breach in accordance with the disciplinary policy. The ultimate sanction for a breach of the policy could be a summary dismissal for gross misconduct.

We are committed to working with suppliers to support necessary improvements but we may also take action if suppliers are not prepared to work collaboratively to drive improvements, which may include termination of commercial contracts where necessary.



Harold Martin
Chairman