



DARLOW LLOYD & SONS

Part of the Darlow Lloyd Group Ltd

Darlow Lloyd & Sons Human Trafficking & Anti-Slavery Policy

Policy Statement.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, agents, contractors, and suppliers.

Darlow Lloyd and Sons Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own supplies will their own suppliers to the same high standards.

Commitments.

Modern Slavery and Human Trafficking;

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with the view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Our commitment is that we should be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance to modern Slavery in our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chains.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm Compliance with our Code of Conduct.
 - Suppliers engaging workers through a third party to obtain third parties' agreement to adhere to the code.

- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance to our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

The Modern (Anti) Slavery policy and Statement is intended for business in all countries, especially the United Kingdom.

Communication and Awareness of this policy

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 updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Name: Donna Lloyd

Signature:



Position: Company Secretary