



MouldAway UK – Anti-Slavery & Human Trafficking Policy

Policy title: MouldAway UK Anti-Slavery & Human Trafficking Policy

Effective date: 05/04/2025

Review date: 05/04/2026

Approved by: Jeanette Hamill

1. Policy Statement

MouldAway UK is committed to preventing slavery, servitude, forced or compulsory labour, and human trafficking in our business and in our supply chains. We adhere to high ethical standards and expect the same from our suppliers and contractors. We will act with integrity, transparency and accountability.

2. Purpose

This policy sets out MouldAway UK's approach to identifying and mitigating the risk of modern slavery and human trafficking in our operations and supply chains. It supports our legal obligations under the Modern Slavery Act 2015 (in particular Section 54: requirement for transparency in supply chains) and aligns with best practice.

3. Scope

This policy applies to:

- All employees of MouldAway UK (permanent, temporary, contract, agency).
- All contractors, subcontractors, suppliers, agents and business partners engaged by MouldAway UK.
- All business operations of MouldAway UK in the UK and abroad, including the supply chain of goods and services.

4. Definitions

- **Modern slavery** includes slavery, servitude, forced or compulsory labour and human trafficking.
- **Supply chain** means all activities, goods and services that feed into our business operations, including subcontractors, second-tier suppliers and procurement of materials or services.
- **Risk of modern slavery** means the situations or conditions where people may be exploited, coerced, vulnerable or subject to unfair labour practices.

5. Our Commitments

MouldAway UK commits to:

- Prohibit modern slavery in our operations and supply chains.
- Conduct due diligence and risk-assessment to identify areas of potential risk of modern slavery.
- Take appropriate steps to mitigate identified risks and monitor effectiveness of those steps.
- Maintain transparent records of our efforts.
- Provide training and raise awareness among employees and key suppliers regarding modern slavery risks and our policy.
- Ensure that any concerns, suspicions or actual incidents of modern slavery are reported and addressed promptly, including via contractual or supply-chain remediation measures.
- Review this policy and our related practices at least annually, or when changes occur in our business, operations or supply-chain risk.

6. Organisation Structure & Supply Chains (Section 54(5)(a))

We will maintain a clear overview of our business structure, the nature of our operations and the goods and services we procure. We will map our supply chains (to the extent practicable) to identify the regions, sectors and suppliers that may present heightened risk of modern slavery. We will prioritise attention to those parts of the chain considered higher risk (for example, low-skilled labour, subcontracting, overseas manufacture/importation, or high risk geographies).

7. Policies in Relation to Slavery and Human Trafficking (Section 54(5)(b))

As part of our ethical governance:

- We embed this Anti-Slavery & Human Trafficking Policy into our wider procurement, supplier-selection and contract-management processes.
- Our standard supplier contracts will include clauses requiring compliance with this policy and the prohibition of modern slavery practices.
- We will not tolerate any form of slavery, servitude, forced labour or human trafficking in our business or in our supply chains.

8. Due Diligence Processes (Section 54(5)(c))

We will apply due diligence when engaging new suppliers or entering new geographic or industry sectors. Our due-diligence processes will include:

- Screening of suppliers, subcontractors and other business partners for modern slavery risk.

- Assessing labour practices, working conditions, and subcontracting arrangements in key parts of the supply chain.
- Incorporating modern slavery risk into our procurement and contract-renewal processes.
- Requiring ongoing supplier certification, audit rights or questionnaires where necessary.
- Taking corrective action if suppliers are found in breach of our policy (including termination of relationship).

9. Risk Assessment and Management (Section 54(5)(d))

We will identify and assess the parts of our business and supply chains where modern slavery risk is most significant. For example:

- Goods or services procured from countries/regions with known labour-exploitation issues.
 - Use of labour brokers or indirect labour in supply chains.
 - Sectors with high labour intensity, high workforce turnover or informal employment.
- For each identified risk we will implement proportionate mitigation: supplier auditing, contractual safeguards, enhanced monitoring, training and remediation. We will monitor our risk profile and review mitigation effectiveness.

10. Key Performance Indicators and Monitoring (Section 54(5)(e))

We will define appropriate key performance indicators (KPIs) to evaluate the effectiveness of our anti-slavery efforts. Possible KPIs include:

- Percentage of high-risk suppliers that have completed a modern slavery risk assessment.
 - Number of suppliers with contractual anti-slavery clauses.
 - Number of reported modern slavery concerns raised and addressed.
 - Percentage of staff and procurement teams trained in modern slavery awareness.
- We will report on progress, review performance and where necessary adjust our approach.

11. Training & Awareness (Section 54(5)(f))

We will provide training to employees, particularly those in procurement, supplier management and contracts, to ensure they understand:

- What modern slavery is, and how to identify warning signs.
- Our policy and procedures for supplier selection and monitoring.



- How to report concerns or incidents of modern slavery.
We will ensure regular refresher training and maintain records of training attendance and content.

12. Reporting, Remediation & Whistle-blowing

- Employees, contractors and suppliers can raise concerns about modern slavery, forced labour or human trafficking in a safe, confidential manner without fear of retaliation.
- We will investigate all reports or concerns promptly and take remedial action as required.
- If we identify modern slavery in our supply chain we will work with the relevant parties to apply corrective action, including termination of contracts if necessary.
- We may also engage third-party experts or law-enforcement as appropriate.

13. Governance & Board Approval

The Board (or senior responsible management) of MouldAway UK is committed to this policy and to overseeing its implementation. A senior officer is designated to take day-to-day responsibility for modern slavery risk and compliance. The Board will receive regular reports on our modern slavery-risk management and policy performance.

If applicable (i.e., where turnover meets the threshold) we will approve and publish our annual Modern Slavery Statement, signed by a director, and published on our website.

14. Publication & Transparency

Where required under Section 54, we will publish our annual Slavery & Human Trafficking Statement (or “Modern Slavery Statement”) on our website and include a prominent link to it on our homepage.

We will also consider listing our statement on the Government’s Modern Slavery Statement Registry.

15. Review

This policy will be reviewed annually (or sooner if there is a significant change in our operations, supply chain, legislation or risk profile). We will update it to reflect evolving best practice, regulatory changes, and lessons learned from incidents or audits.

16. Consequences of Non-Compliance

Failure by any employee, contractor or supplier to comply with this policy may lead to disciplinary action (in the case of employees) or termination of contracts (in the case of suppliers/contractors).



We recognise the serious reputational and legal risks of modern slavery and commit to taking effective action.

Signature:

Name: Jeanette Hamill

Position: Director

Signature:

Date: 05/04/2025