

Modern Slavery Policy

emovis UK

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1. Purpose

This policy sets out emovis' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic. Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. This document applies to the whole organisation and its suppliers and partners.

2. Procedure

2.1. Countries of Operation and Supply

We currently operate only in the UK and therefore considerate it low risk in relation to slavery or human trafficking.

2.2. Responsibility

Responsibilities for our anti-slavery initiatives are outlined below:

- HR Department to ensure that all employees and contractors have the right to work in the UK and that they are provided with Terms & Conditions that will ensure protection against modern slavery or human trafficking.
- Supply Chain Department to ensure that all subcontractors comply with UK regulations and all their employees are protected against modern slavery or human trafficking and to ensure that our contracts with all subcontractors enforce these rules.
- Compliance Department to ensure and audit that the business is complying with all regulations and that our policies and processes are robust.

2.3. Policy

The HR Department, Compliance and Supply Chain are responsible for implementing and designing the business policies to protect the business, its suppliers, and its employees. We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing policy
- Employee Code of Conduct
- Procurement Code of Conduct

Emovis also has applicable provisions in place, such as risk assessments conducted by the Compliance Department and clear recruitment guidelines.

2.4. Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;

- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

2.5. Performance Indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to have completed training on modern slavery annually;
- reviewing its existing supply chains annually, whereby we evaluate all existing suppliers.

2.6. Training

We require all staff within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

3. Responsibilities

It is the responsibility of the readers to ensure that they have read and understood this procedure and sought clarifications where necessary.

It is the responsibility of department managers to carefully review SOPs prior to approval.

It is the responsibility of all staff members to notify firstly, the originating department and then, if required, the Quality & Performance Department if changes are found to be necessary to this document.

The IT Department must ensure that all employees have the relevant equipment and access to the systems required to do their jobs appropriately and to ensure that the relevant security measures and systems are in place to protect the business and the employees.

Document Control

Title:	Version:	Changes	Changed by:	Approved by:	Change Date
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