

Purpose

Bennett Hay maintains relationships with many different organisations in its supply chain, as well as employing colleagues directly. Recognising our responsibility as an employer and a customer, this statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

This statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or whom we appoint to act on our behalf. We expect all parties engaged in any business activity with Bennett Hay to be familiar and compliant with this statement.

Principles

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all Bennett Hay colleagues. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain.

We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect our suppliers to hold their own suppliers to the same high standards.

Compliance

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

Colleagues are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains at the earliest possible opportunity.

We aim to encourage openness and will support any colleague who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith his or her suspicion that modern slavery in whatever form is or may be taking place in any part of our own business or in any part of our supply chain.

Policy Breach

Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We will terminate our relationship with suppliers, contractors or any other individuals working on our behalf if they breach this policy.