

Anti-Slavery and Human Trafficking Policy

Speedy Group Policy



Policy Owner: Company Secretary

Version: 1.0

Owner Division: Company Secretarial

Lifecycle: 12mnths

1. Policy Statement

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place in our own business or in any of our supply chains.
- 1.2. We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.
- 1.3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners and suppliers.

2. What is modern slavery?

- 2.1 Slavery. The behaviour which deprives the victim of his or her freedom as though the offender owns the person.
- 2.2 Servitude. The obligation to provide services that is imposed by the use of coercion.
- 2.3 Forced or compulsory labour. Service which is exacted from a person under the menace of any penalty, where the person has not offered themselves voluntarily and involves coercion, which may be direct threats of violence or more subtle forms of compulsion.
- 2.4 Human trafficking. The offence of human trafficking arises when a person arranges or facilitates the travel of another person with a view to that person being exploited even where the victim consents to the travel.
- 2.5 Standards we may apply. The following are examples of principles that may indicate modern slavery:
 - Child (under 16 years of age) labour being used.
 - Any form of forced or compulsory labour. Workers must be free to leave employment or work after reasonable notice.
 - Passports being taken from workers (other than for visa requirements).

- All forms of debt bondage. Workers should not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay.
- Compensation and benefits that do not comply with local laws relating to minimum wages, overtime hours and legally mandated benefits.
- The formation of trade unions and powers of collective bargaining not being respected.
- Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health.

3. Responsibility for the policy

- 3.1 The Executive Board has overall responsibility for ensuring this policy complies with Speedy's legal and ethical obligations, and that those under our control comply with it.
- 3.2 The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and attend any required training on it.

4. Compliance with the policy

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 If you believe or suspect a breach of this policy has occurred or that it may occur in the future, you must notify your manager or the Company Secretary or report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Company Secretary.
- 4.5 We aim to encourage openness and, consistent with our Whistleblowing Policy, will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

5. Communication and awareness of this policy

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us, and appropriate training will be devised for existing staff.
- 5.2 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.

6. Breaches of this policy

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