## **Modern Slavery Policy**

- 1. Now Dutton Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
- 2. Now Dutton Ltd is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
- 3. Now Dutton Ltd provides appropriate training and awareness information for all of its staff. In particular:
  - Our senior managers receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
  - Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
- 4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Keely Hoff, HR & Compliance Manager.
- 5. Reports surrounding these issues are taken extremely seriously by our Board of Directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our preferred supplier list,
  - Passing details to appropriate law enforcement bodies.
- 6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - The percentage of workers and/or candidates supplied from audited businesses / our preferred supplier list,
  - The effectiveness of enforcement against suppliers who breach policies,
  - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - The level of modern slavery training and awareness amongst our staff.
- 7. This policy will be reviewed on an annual basis.

Adam Sheekey Chief Executive Officer Now Dutton Ltd