

MODERN SLAVERY & HUMAN TRAFFICKING POLICY



Step on Safety

SOS-105-v4

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. At Step on Safety Ltd we shall comply with legislation and maintain a zero-tolerance approach to modern slavery. In keeping with this, we are committed to acting ethically and with integrity in all our business dealings and relationships. We aim to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. Refer to Ethical Conduct & Anti-Bribery Policy.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all our suppliers and other business partners including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same standards. Therefore, we expect our supply chain to take appropriate measure to address modern slavery within their own organization and within their own supply chain. Minimum measures shall include:

- Ensuring that Modern Slavery is included in policy documents and a commitment to addressing the issue is outlined
- Having an action plan on how to address the issue and a commitment to producing a risk assessment to identify high risk areas
- Conducting awareness raising exercises to make staff aware of, and able to recognize, modern slavery through the use of toolbox talks and training
- Taking modern slavery into account during the recruitment process
- Taking modern slavery into account during the procurement process
- For businesses with a turnover of £10 million or above, a Modern Slavery statement must be created

This policy applies to all persons working for or on our behalf of Step on Safety in any capacity, including:

- Employees at all levels
- Directors (executive and non-executive)
- Our workforce
- Any agency workers
- Any seconded workers
- Any contractors
- External consultants
- Third-party representatives
- Any other business partners

This policy does not form part of any of our employee's contract of employment and may be amended at any time.

Responsibility for the Policy

The Managing Director (MD) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The MD maintains primary responsibility, although the Quality Manager (QM) may be involved with day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

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Step on Safety

continued

Compliance with the Policy

All employees must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for Step on Safety or under our control. Everyone is required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. 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 directly to the MD or QM.

We aim to encourage openness and will support anyone who raises genuine concerns 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 their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the MD or QM immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

Communication and Awareness of this Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us and associated (and refresher) training will be provided as necessary.

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.

Breaches of this Policy

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

We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Kevin Webb
Managing Director

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FOR MORE INFORMATION

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