

Private & Confidential

# *Modern Day Slavery Act 2015 Policy Statement*

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## Modern Day Slavery Act 2015 Policy Statement

## 1. VERSION CONTROL

Version	Author	Approved By	Details	Date
V1.00	E Harris	V King	Document Creation	08/2015
		V King	Review – no changes	10/2016
		V King	Review – no changes	08/2017
		T Castiglione	Review – no changes	10/2018
		T Castiglione	Review – no changes	10/2019
		T Castiglione	Review – no changes to policy – template refreshed	04/2020
		T Castiglione	Review – no changes	05/2021
		T Castiglione	Review – no changes	05/2022
		T Castiglione	Review – no changes	04/2023
		T Castiglione	Review – no changes	05/2024
		T Castiglione	KPIs added.	04/2025
V2.00	E Harris	T Castiglione	Group Logo updated – no other changes.	04/2026

## Modern Day Slavery Act 2015 Policy Statement

**2. PURPOSE OF POLICY STATEMENT**

- 2.1 This Policy Statement is made on behalf of the Group pursuant to The Modern Day Slavery Act 2015 Section 54 (1) and comprises our slavery and human trafficking statement, is approved by the Board and signed by the Group's CEO..

**3. OVERVIEW**

- 3.1 The Group Statement on Slavery and Human Trafficking establishes the Group's commitment to preventing the use of forced, bonded, indentured labour, involuntary prison labour, slavery or trafficking of people.
- 3.2 The Policy embodies the spirit of our Corporate Social Responsibility Policy, Human Rights Policy and Business Conduct & Ethics Code.
- 3.3 This Policy applies to all employees.
- 3.4 The Group also expects its suppliers to maintain progressive employment, environmental, health, and safety practices that meet, or exceed all applicable laws and relevant codes of practice such as the Group's Business Conduct & Ethics Code and Supplier Code of Conduct..
- 3.5 The Group is committed to respecting human rights and upholding the values and high standards of ethics expressed in our Human Rights Policy, Corporate Social Responsibility Policy and Business Conduct & Ethics Code.

**4. SLAVERY & HUMAN TRAFFICKING**

- 4.1 The Group will not use or tolerate the use of forced, debt bonded, indentured labour, involuntary prison labour, child labour, slavery or human trafficking in its business or supply chain. This includes recruiting, harbouring, transporting, providing, receiving, or obtaining of a person for labour services, or commercial sex acts through the use of force, fraud, coercion, abduction or fraud for the purpose of involuntary servitude, peonage, debt bondage, or slavery.
- 4.2 There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting Group-provided facilities. All work must be voluntary.
- 4.3 We will not destroy, conceal, hold or otherwise deny access by employees to their identity or immigration documents, such as passports, work permits or drivers' licenses regardless of issuing authority. The one exception is where the holding of work permit by the employer is required by law.
- 4.4 Migrant workers shall not pay for their employment. Any recruiters used to source workers must comply with UK Law.
- 4.5 The costs of recruiting and hiring, transportation (to facility and return home), or any government-imposed fees shall be paid directly by the supplier. Any fees charged to the workers must be disclosed and returned to them.
- 4.6 Workers shall not be required to post any bond or make any deposit.
- 4.7 The worker shall not be required to participate in any savings program unless required by law.
- 4.8 Working conditions, pay, benefits and treatment of migrant workers must be the same as local workers.
- 4.9 Worker dormitories contracted or provided by the supplier, or a labour agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space.

**5. COMPLIANCE**

- 5.1 The Group will monitor and track our compliance through our business management systems and our own professional resource:
- The Group maintains a Legal Register for Health & Safety and Environmental aspects.
  - Human Resources Management Information System providing visibility of hours and pay rates.
  - Qualified Human Resources Function, responsible for compliance with Employment Law and associated Group Policies.
  - In-house legal counsel.

**6. SUPPLY CHAIN**

- 6.1 The Group expects its supply chain to uphold the same values as we do within the Group and be compliant with UK and Local Law.
- 6.2 We expect our suppliers to respect human rights, including maintaining policies and procedures to prevent the use of child or forced labour.
- 6.3 We conduct ongoing due diligence of key suppliers to ensure compliance with Section 54 of the Modern Slavery Act 2015.

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6.4 Our suppliers are contractually obligated to fully comply with the Group's Conduct & Ethics Code and all applicable laws.

6.5 The Group's Supplier Approval & Management Policy and Supplier Code of Conduct outlines due diligence requirements and KPI's.

## 7. EMPLOYEE AWARENESS

7.1 All employees are provided with an Employee Handbook and a copy of our Business Conduct and Ethic Code during induction for which they sign a declaration.

7.2 Attention is brought to the Group's Disciplinary Policy for failure to comply with relevant policies.

7.3 All related policies are easily accessible to all employees either through the internal central document system or their line manager.

## 8. NON-COMPLIANCE

8.1 We have internal accountability standards and procedures for employees and contractors who fail to meet our expectations regarding the Group's Business Conduct & Ethics Code.

8.2 The Group maintains central management systems to report non-compliance of potential ethical, legal or regulatory violations related to our suppliers.

8.3 Actions for non-compliance will be managed through the Group's Disciplinary Policy or Supplier Contractual Clauses.

## 9. KEY PERFORMANCE INDICATORS

9.1 MBA measure the effective implementation of our Modern Day Slavery Act 2015 Policy Statement through Key Performance Indicators, which are described in the table below:

Key Performance Indicator	Applies to	Target	Performance (last reporting period)
Modern Day Slavery Act 2015 Policy Statement reviewed and updated during prior 12 months	MBA Group	Yes	Yes, 04/2026
Number of Modern Day Slavery incidents reported	MBA Group	0 (zero)	0 (zero)
Average response time to Modern Day Slavery incidents	MBA Group	3 working days	None reported
Grievance mechanism accessible to staff, suppliers, and contractors, and reviewed and updated during prior 12 months	MBA Group	Yes	Yes, 04/2026
Percentage of operations assessed for Modern Day Slavery risk each year	MBA Group	100%	100%
Percentage of new suppliers screened for Modern Day Slavery risks prior to first order	Suppliers	100%	100%
Percentage of suppliers who have acknowledged MBA's Modern Day Slavery Act 2015 Policy Statement via our Code of Conduct	Suppliers	100%	100%
Number of Modern Day Slavery incidents reported by suppliers	Suppliers	0 (zero)	0 (zero)



**Sami Aintaoui**  
Chief Executive Officer

## MODERN DAY SLAVERY ACT - MBA LINK:

<http://www.mba-group.com/modern-day-slavery-act>