



WARDELL ARMSTRONG

Modern Slavery and Human Trafficking Policy

This Policy has been approved by the Managing Director on 4 June 2018

1. INTRODUCTION

Modern Slavery is a criminal offence as defined in the Modern Slavery Act 2015. This document sets out the policy for Wardell Armstrong with the aim being to prevent opportunities for Modern Slavery and Human Trafficking, including Child Labour, to occur within its business or suppliers.

2. POLICY STATEMENT

Wardell Armstrong is committed to ensuring there is no Modern Slavery or Human Trafficking in any part of our business or in our supply chains.

3. DUE DILIGENCE

- Wardell Armstrong will not support or deal with any business knowingly involved in Modern Slavery or Human Trafficking;
- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- With regard to our supply chains, we expect our suppliers to have suitable anti-slavery and human trafficking policies and processes, and we reserve our right to inspect these;
- Concerns should be reporting using the procedure set out in this policy.

4. SUPPLIER ADHERENCE TO OUR VALUES

We have a zero tolerance to Modern Slavery and Human Trafficking. To underpin our compliance with regulatory obligations whilst acknowledging that we do not control the conduct of individuals and organisations in our supply chain, we conduct annual supplier reviews to assess supplier adherence.

5. REPORTING INCIDENTS

Any concerns about Wardell Armstrong or our suppliers regarding any suspected modern slavery should be reported immediately to the Human Resources Department (humanresources@wardell-armstrong.com). The nature of the complaint will determine the company's actions.

If your disclosure constitutes 'whistleblowing' then as a whistleblower you will be protected by law from any unfair action.

6. TRAINING

Should a training requirement be identified, training will be provided to employees to ensure a good understanding of potential risks in our business or from our suppliers.

7. REVISION OF THE SCHEME

This policy will be annually reviewed in light of any change to legislation or good practice.