
Policy owner	Board of Directors, Delegat Group Limited
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Applicability	Delegat Group and its subsidiaries

Introduction

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 depriving an individual of their freedom for personal or commercial gain by a third party. The Delegat Group has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

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 and with our contractor parties, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect and will enforce the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include 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 contractors, suppliers and business partners will hold their own suppliers to the same high standards.

Policy

Delegat Group's policy is a zero tolerance position to modern slavery.

Purpose and Scope

All companies within the Delegat Group must comply with this policy and ensure that it is brought to the attention of all of their staff and, where appropriate, to their contractors, suppliers and business partners.

This policy applies to all individuals working for the Company, including but not limited to directors, officers, managers, employees, contractors, consultants, trainees, placement students, fixed-term and part-time employees, casual and agency staff and volunteers (collectively referred to as staff in this policy).

Any third parties who have access to our systems are also required to comply with this policy.

Breaches of this Policy

We will take a strict approach to breaches of this policy, which will be dealt with in accordance with each Deleat Group company's disciplinary policy and procedure. Serious breaches may amount to gross misconduct resulting in dismissal. If appropriate, information may be handed to the Police or relevant authorities in connection with a criminal investigation.

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

Roles and Responsibilities

The Board of Directors of Deleat Group Limited 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 Managing Director's office, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring internal control systems and procedures are in place across the Group and operation functions to ensure that they are effective in countering modern slavery.

Management 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.

Compliance with this Policy

You must ensure you have read, understand and comply with this policy.

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.

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

You 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 as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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 contravenes this policy, raise it with your manager.

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. There should be no detrimental treatment of employees in respect of their reporting, including dismissal, disciplinary action, threats or other unfavourable treatment. If you believe that you have suffered any such treatment, you should inform the Chief Financial Officer immediately. If the matter is not remedied, and you are an employee, you should raise the matter formally to the Managing Director.

Communication awareness and training

Training on this Policy, and on the risk of our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and ongoing training and/or updates will be conducted (as necessary) at regular intervals.

Senior Management is responsible for ensuring all staff receives the appropriate level of training.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners as appropriate from the outset of our business relationship with them and reinforced as appropriate thereafter.