

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Safeguard VP Ltd



	NAME	ROLE	SIGNATURE	DATE	 TREK-GROUP			
ESTABLISHED	James FENWICK-SMITH	Divisional Managing Director	[Electronically Signed]	20/11/2023				
VERIFIED	Daniel Oakes	Managing Director	[Electronically Signed]	20/11/2024				
APPROVED	Oliver HALSTEAD	Group Operations Director	[Electronically Signed]	20/11/2024				
CONFIDENTIALITY CLASSIFICATION					ASCHT	1.0	en	4
PUBLIC ☐		RESTRICTED ☐		CONFIDENTIAL ☒	DOCUMENT REF.	RB/	LANG.	PAGES

This document and its contents are the property of Safeguard VP Limited. This document contains confidential pro information. The prietary reproduction, distribution, utilisation or the communication of this document or any part thereof, without express au strictly prohibiteddhorisation is Offenders will be held liable for the payment of damages.

1 REVISION HISTORY

Revision	Author	Date	Pages	Comments

Purpose

Safeguard VP Limited have a **zero-tolerance approach to modern slavery & human trafficking**, 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 own business or in any of our supply chains.

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 (arranging or facilitating the travel or movement of a victim with a view to them being exploited).
- Committing any offence with the intention to commit human trafficking.
- Aiding, abetting, counselling, or procuring any of the above offences.

All the above have in common the deprivation of one person's liberty by another to exploit them for personal or commercial gain.

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 high standards from all 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 suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

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 the policy

All employees and third-party representatives must 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 or report it in accordance with our Whistleblowing Procedure 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.

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.

Communication and awareness of the policy

Training on this Policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

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.