

1. INTRODUCTION AND STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, compulsory labour and human trafficking for exploitation and can have a significant adverse impact on individuals and their family members across the world.
- 1.2 We have a zero tolerance approach to modern slavery across all areas of our organisation, as well as in our supply chains. We are committed to ensuring we are not connected to modern slavery in any way. We aim to ensure that our business operates in an open and transparent way and our approach to tackling modern slavery throughout our supply chains is consistent with our obligations under the Modern Slavery Act 2015.
- 1.3 We aim to work in partnership with all our contractors, suppliers and other business partners to ensure that they share and work towards the same values we hold against slavery and human trafficking. To manage this, 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. We also ask our suppliers to confirm their compliance with Modern Slavery Act 2015 as necessary.
- 1.4 We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 1.5 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. All employees must ensure that they have read, understand and comply with this policy.

2. Guiding Principles – general requirements

- 2.1 As part of our initiative we have in place systems to:
 - 2.1.1 Identify and assess potential risk areas in our supply chains;
 - 2.1.2 Mitigate the risk of slavery and human trafficking occurring in our supply chains;
 - 2.1.3 Monitor potential risk areas in our supply chains; and
 - 2.1.4 Protect whistle blowers.
- 2.2 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issue or suspicion of

modern slavery in any parts of our organisation or supply chains at the earliest possible stage.

- 2.3 If an employee believes or suspects a breach of this policy has occurred or there is a risk of a breach occurring, they must notify their manager or report it in accordance with our Speaking Up (Whistleblowing) Policy as soon as possible.
- 2.4 We 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 organisation or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform Human Resources immediately. If the matter is not remedied, an employee should raise it formally using our Grievance Procedure.

3. Responsibility for this Policy

- 3.1 The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 3.2 The Director of Governance has primary and 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.
- 3.3 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.
- 3.4 All contractors and suppliers within our supply chain are required to confirm compliance to this policy.

4. Training and awareness

- 4.1 We are committed to providing training on this policy and on the risks our organisation faces from modern slavery both within our organisation and in its supply chains. Training on this forms part of the induction process for all individuals who work for us, and regular refresher training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Modern Slavery & Human Trafficking Statement

- 5.1 Section 54 of the Modern Slavery Act 2015 requires Saffron to develop and publish a slavery and human trafficking statement if Saffron's consolidated turnover exceeds the £36m threshold. The statement should aim to include information about:

1. the organisation’s structure, its business and its supply chains;
 2. its policies in relation to slavery and human trafficking;
 3. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
 4. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
 5. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
 6. the training and capacity building about slavery and human trafficking available to its staff.
- 5.2 Saffron will publish this statement in a prominent location on the website.
- 5.3 The Chief Executive is responsible for making and signing the statement, and the statement will be reported to Board for information.

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