

THE MODERN SLAVERY AND HUMAN TRAFFICKING ACT 2015

Who this Policy Applies To

This policy is implemented and reviewed by the Directors and Management of Longwood Engineering. It applies to all our officers, directors, employees whether permanent or temporary. It also applies to all our supply chain partners, including any agents, advisers, consultants (together “Associated Persons”). It is our Companies’ due diligence processes relating to slavery and human trafficking in our possible supply chains.

Longwood Engineering will respect the human rights of all employees and ensure they are treated fairly in all respects. We will comply with all relevant UK legislation including:

Working Time Directive (2003/88/EC), National Minimum Wage Act 1998, Employment Rights Act 1996, Protection of Young People at Work Council Directive 94/33/EC, Trade Union & Labour Relations (Consolidation) Act 1992, TUPE Act 2006, Pensions Act 2004, The Gang masters (Licensing) Act 2004, The Equality Act 2010, The Immigration, Asylum and Nationality Act 2006, The Modern Slavery Act 2015, other relevant UK legislation and all applicable obligations under European Labour Law within the European Convention on Human Rights.

We have in place appropriate due diligence processes to assess and manage new starter employees and temporary staff including current employees. During company induction copies of passport/birth certification are verified and any visas required are verified with the appropriate ‘right to work’ permits under the Home Office guidance. Under our GDPR data retention process policy we verify and retain documents in employee personnel files for 2 years after employment termination of contract.

Longwood Engineering will only engage with supply chains that have and can demonstrate a zero tolerance to slavery and human trafficking together with compliance to the Modern Slavery Act 2015. Subcontractors and Suppliers are also reminded of their statutory obligations under the Equality Act 2010: these include not to discriminate directly or indirectly on the grounds of colour, race, nationality, ethnic or national origins, sex, marital status, gender reassignment, disability, sexual orientation, religion, belief or age (“unlawful discrimination”) in relation to decisions taken to recruit, select, remunerate, train, transfer and promote employees.

We also require compliance to the Immigration, Asylum and Nationality Act 2006, Immigration Act 1971. Illegal working often results in abusive and exploitative behaviour, the mistreatment of illegal migrant workers, tax evasion and poor housing conditions. It can also undercut legitimate businesses and have an adverse impact on the employment of people who are lawfully in the UK.

The risk of Modern Slavery in our own operations is low. This is because the personnel are employed by the Company directly, and:

- Our Code of Conduct and related policies set out our values and principles, emphasising Zero Harm and no tolerance for discrimination, harassment, bullying, retaliation or retribution, bribery, corruption or serious worker misconduct;
- All personnel receive regular training, beginning with induction training, on the values and principles set out in the Code of Conduct that are required to be followed by every employee every day;

- Our personnel have the right to engage in collective negotiations with or without the involvement of third parties, such as unions;
- Our 'Whistle blowing' policy is actively promoted;
- We conduct regular assessments and internal audits of our processes and systems and, where issues are identified, take prompt action to remedy them. Amongst these assessments, we periodically review all employee addresses and bank account details to see whether more than one employee resides at the same address or utilises the same bank account. Where duplicate addresses or bank accounts are identified, we ensure that there is a valid reason for them. We encourage our suppliers to do the same.

Supply Chain

Supply chain clause being added to the bills so that "big business will be forced to make public its efforts to stop the use of slave labour by its suppliers" From 29 October 2015 the *Transparency in Supply Chain Provisions* require businesses to publish an annual statement if they have an annual turnover above a threshold (£36 million).

The statement must confirm the steps taken to ensure that slavery and human trafficking are not taking place in the business (or in any supply chain) or declare that no steps to confirm the existence of slavery or trafficking have been taken. There are, however, no legally binding requirements to conduct due diligence on supply chains and there are no criminal or financial penalties for non-compliance.

We undertake supplier due diligence through approved sub contractor questionnaires. All suppliers are requested to demonstrate an understanding of the issues around modern slavery and obliged to meet minimum training requirements. A process of continuing due diligence is encouraged through our supply chain sustainability charter.

See also documents on:

- Human trafficking in the United Kingdom
- Migrant domestic workers
- Modern Slavery in Supply Chains – an overview from CORE
- Whistle blowing procedure
- Supply chain sustainability charter
- GDPR data retention process
- GDPR employee record of processing

Reviewed 22 December 2023

L-J Battye

Director/Co. Secretary