



**Graffiti Design International Ltd
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Swife Business Park
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POLICY DOCUMENTS 2020 - 2021



**Review date
March 2021**

Updates

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Signed



01/01/2020

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EQUALITY & DIVERSITY POLICY

1. INTRODUCTION

The Graffiti Design / Gdi Signs hereinafter called 'the Company' recognises that discrimination or victimisation of personnel on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation is unacceptable, and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the stated aim of the Company that no current employee or applicants for new roles receives any less favourable treatment (either directly or indirectly) in either the recruitment process or subsequent employment.

It is the Company's intention so far as reasonably practicable that its workforce is representative of all sections of society and as such each employee feels respected and able to give of their best.

The purpose of this policy is to provide equality and fairness for every member of staff.

2. POLICY STATEMENT

- 2.1 To create a working environment in which individual differences of all our staff are recognised and valued.
- 2.2 Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- 2.3 All staff will have the opportunity to develop their career through training, development and progression.
- 2.4 Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- 2.5 This policy is fully supported by the management of Graffiti Design/Gdi Signs.
- 2.6 We will review all our employment practices to ensure that fairness is applied throughout the business.
- 2.7 All employees, whether full or part-time will be treated fairly and with respect
- 2.8 Selection for employment, promotion, training etc will be on purely on the basis of aptitude and ability.
- 2.9 All employees will be encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.
- 2.10 Personnel working for or on behalf of the Company will not discriminate or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 2.11 Any staff member including sub-contract personnel found to have behaved in an inappropriate manner will be subject to disciplinary procedures.

The nature of the Company's business means that it is unlikely that anyone with a physical disability would be able to carry out the required work on site. Nevertheless the Company attaches particular importance to the needs of the disabled.

- 2.12 In accordance with this policy, the management are required to:
 - 2.12.1 make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, re-training, provision of special equipment, reduced working hours. (Managers will be expected to seek advice and

- guidance from external agencies on how to keep any disabled staff members employed);
- 2.12.2 give reasonable consideration to disabled people who apply for work with the Company, having regard for their ability to allow them to do the job.
- 2.12.3 consider making reasonable adjustments to the job and /or the working environment.

This policy and any associated procedures or arrangements shall operate in accordance with statutory requirements or Codes of Practice issued by HM Government Departments, and any other statutory bodies.

The policy will be monitored and reviewed annually.

3. MANAGEMENT DUTIES

- 3.1 The Managing Director is responsible for ensuring the implementation of this Policy; both management and supervisors will ensure that they and their staff operate within this policy and that all reasonable steps are taken to avoid discrimination.
- 3.2 Each manager/supervisor will ensure that:
 - 3.2.1 all their staff are aware of the policy, and the reasons for it. any grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
 - 3.2.2 proper records are maintained of all correspondence and meetings.
- 3.3 The Managing Director will be responsible for monitoring the operation of the policy.

4. STAFF RESPONSIBILITIES

- 4.1. All staff members have a responsibility for ensuring that there is no discrimination applied to anyone inside the company or to any clients.
- 4.2. The attitudes of all staff members are crucial to having fair employment practices.
- 4.3. In particular, all members of staff are required to:
 - 4.3.1. comply with the policy and its arrangements;
 - 4.3.2. not discriminate in their day to day activities or induce others to do so;
 - 4.3.3. not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
 - 4.3.4. ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
 - 4.3.5. Inform their manager if they become aware of any discriminatory practice.

5. TRAINING

- 5.1. Training on equality issues will be given to all staff when they join the Company and as part of Toolbox Talks.
- 5.2. All managers who are involved in recruitment will receive specialist training to ensure that they are aware of this Policy and their responsibilities.

6. MONITORING

- 6.1. The Company will maintain details on any members of staff who have been involved in any disciplinary procedures involving bullying harassment or any discrimination.

6.2. Where the Company employs anyone with a disability, an equality impact assessment will be carried out to ascertain the effectiveness that the Company's policies may have on those who experience them. These will normally be carried out at the annual performance appraisal interviews.

6.3. Any information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

If monitoring or the equality impact assessments highlight any indication that the Company, or specific people are not fully compliant, then an action plan will be developed to address these issues. Where necessary this will include a review of recruitment and selection procedures, Company policies and practices.

7. GRIEVANCES/DISCIPLINARY PROCEDURES

7.1. Any employee who considers he has been the victim of unequal treatment or discrimination on the grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation has the right to pursue his complaint in accordance with the Company Grievance or Harassment Procedures.

7.2. Any member of staff found to have breached this Policy will be liable to be dealt with under the Company Disciplinary Procedure.

8. REVIEW

This policy will be reviewed annually or when there is a change in circumstances in work practices or the introduction of new legislation.

Section 2 Anti-Bribery and Corruption Policy

1. Introduction
2. The Policy
3. Who is covered
4. Definition of Bribe
5. Gifts & Hospitality
6. Facilitation payments
7. Donations
8. Record Keeping
9. Raising concerns
10. Monitoring

ANTI – BRIBERY & CORRUPTION POLICY

1. INTRODUCTION

It is Graffiti Design /Gdi Signs policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

2. THE POLICY

We will not provide or accept gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

3. WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

4. WHAT IS A BRIBE?

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his duties.

5. GIFTS AND HOSPITALITY

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the Company's policy in respect of gifts and hospitality.

6. FACILITATION PAYMENTS AND KICKBACKS

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7. DONATIONS

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

8. RECORD KEEPING

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained

with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

9. RAISING CONCERNS

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

10. MONITORING

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.

This statement represents our general position on all forms of bribery and corruption issues and the policies and practices we will apply in conducting our business

Section3 Data Protection Policy

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4. General Principles
5. Roles and Responsibilities
6. Data subjects' rights
7. Data Controllers
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9. Confidentiality

DATA PROTECTION POLICY

1 INTRODUCTION

This policy applies to all data held by Graffiti Design / Gdi Signs (“the Company”) whether it is stored on computer/cloud or in manual (paper based) files. The Policy aim is to protect all information pertinent to the Company and to its employees.

2. THE POLICY

This policy applies to all staff members of the Company. For the purposes of this policy, the term “Staff” means all members of Graffiti Design /Gdi Signs including permanent, fixed term, and temporary staff, Labour Only Sub-Contractors, and agency workers.

All contractors and agents acting for or on behalf of the Company will be made aware of this policy.

3. DEFINITIONS

The Data Protection Act 1998 is designed to protect individuals and personal data, which is held and processed on their behalf. The Act defines the individual as the ‘data subject’ and their personal information as ‘data’. These are further defined as:

3.1 Data Subject: Any living individual who is the subject of personal data whether in a personal or business capacity

3.2 Data: Any personal information which relates to a living individual who can be identified. This includes any expression of opinion about the individual.

Data is information stored electronically i.e. on computer, including word processing documents, emails, computer records, CCTV images, microfilmed documents, backed up files or databases, faxes and information recorded on telephone logging systems

Manual records which are structured, accessible and form part of a ‘relevant filing systems’ (filed by subject, reference, dividers or content), where individuals can be identified and personal data easily accessed without the need to trawl through a file.

3.3 Personal Data: Any information which relates to a living individual who can be identified from the information. It also extends to any information which may identify the individual. Examples of personal data:

A person’s name and address (postal and email)

Date of birth

Statement of fact

Any expression or opinion communicated about an individual

Minutes of meetings, reports

Emails, file notes, handwritten notes, sticky notes

CCTV footage if an individual can be identified by the footage

Employment applications

Spreadsheets and/or databases with any list of people set up by code or staff number

Employment or education history

3.4 Sensitive Personal Data: Any information relating to an individual's:

Ethnicity

Gender

Religious or other beliefs

Political opinions

Membership of a trade union

Sexual orientation

Medical history

Offences committed or alleged to have been committed by that individual

4. GENERAL PRINCIPLES

4.1 Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data. The Data Protection Act 1998 sets legislative requirements for organisations processing personal data (referred to under the Act as 'Data Controllers').

4.2 The Company will be open and transparent when processing and using private and confidential information by ensuring we follow the eight Data Protection Principles of good data handling:

4.2.1 meeting our legal obligations as laid down by the Data Protection Act 1998

4.2.2 ensuring that data is collected and used fairly and lawfully processing personal data only in order to meet our operational needs or fulfil legal requirements

4.2.3 taking steps to ensure that personal data is up to date and accurate

4.2.4 establishing appropriate retention periods for personal data

4.2.5 ensuring that data subjects' rights can be appropriately exercised providing adequate security measures to protect personal data

4.2.6 ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues

4.2.7 ensuring that all staff are made aware of good practice in data protection

4.2.7 providing adequate training for all staff responsible for personal data ensuring that everyone handling personal data knows where to find further guidance

4.2.8 ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly regularly reviewing data protection procedures and guidelines within the organisation.

4.3 Data protection principles

4.3.1 Personal data shall be processed fairly and lawfully.

4.3.2 Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

4.3.3 Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

4.3.4 Personal data shall be accurate and, where necessary, kept up to date.

4.3.5 Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

- 4.3.6 Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.
- 4.3.7 Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- 4.3.8 Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

4.4 The Company recognises and understands the consequences of failure to comply with the requirements of the Data Protection Act 1998 may result in:

- 4.4.1 Criminal and civil action;
- 4.4.2 Fines and damages;
- 4.4.3 Personal accountability and liability;

4.5 The Company may also consider taking action, in accordance with the Company's Disciplinary Procedure, where staff do not comply with the Data Protection Act 1998.

5 ROLES AND RESPONSIBILITIES

- 5.1 Staff will not attempt to gain access to information that is not necessary to hold, know or process. Any information which is held will be relevant and accurate for the purpose for which it is required. The information will not be kept for longer than is necessary and will be kept secure at all times.
- 5.2 The Company will ensure that all personal information is anonymised as part of any evaluation of assets and liability assessments except as required by law.
- 5.3 Staff who manage or process personal information will ensure that it is kept secure and confidential. Sensitive personal information will only be processed in line with the provisions set out in the Data Protection Act 1998 and only processed in accordance with instructions set out by the respective Data Controllers.
- 5.4 The Company will ensure that all staff who are involved in handling personal data are made aware of the reasons
 - 5.4.1 why personal and sensitive personal data is being processed:
 - 5.4.2 how it will be processed
 - 5.4.3 who will process it
 - 5.4.4 how it will be stored and
 - 5.4.5 how it will be disposed of when no longer required.

6. DATA SUBJECTS RIGHTS

- 6.1 Protection Act to access any personal data held on our systems and in our files upon their request, or to delete and/or correct this information if it is proven to be inaccurate, excessive or out of date.
- 6.2 The Company recognises that individuals have the right to make a request in writing and obtain a copy of their personal information, if held on our systems and files.
- 6.3 The Company recognises that individuals have the right to prevent data processing where it is causing them damage or distress, or to opt out of automated decision making and stop direct marketing.

7. COMPANY (DATA CONTROLLERS) OBLIGATIONS

- 7.1 The Company will adhere to and follow the eight principles of data protection when conducting surveys, marketing activities etc., where the Company collects, processes, stores and records all types of personal data.
- 7.2 The Company will not transfer or share personal information with countries outside of the European Union unless that country has a recognised adequate level of protection in place in line with the recommendations outlined in the Data Protection Act.
- 7.3 The Company will ensure all staff are provided with data protection training and promote the awareness of the University's data protection and information security policies, procedures and processes.

8. COMPLAINTS

- 8.1 Complaints relating to breaches of the Data Protection Act 1998 and/or complaints that an individual's personal information is not being processed in line with the 8 principles of data protection will be managed and processed by the Company Secretary.
- 8.2 All complaints of dissatisfaction will also be processed in accordance with the Company Grievance and Complaints Process and should be sent to:

Graffiti Design
Design House,
Swife Business Park,
Burwash Road,
Heathfield, Sussex, TN21 8UP

9. CONFIDENTIALITY AND INFORMATION SHARING

- 9.1 The Company will only share information in accordance with the provisions set out in the Data Protection Act 1998.
- 9.2 Where applicable the Company will inform individuals of the identity of third parties to whom we may share, disclose or be required to pass on information to, whilst accounting for any exemptions which may apply under the Data Protection Act 1998.

This is Graffiti Design / Gdi Signs stated Policy of Data Protection and Information Security. It will be reviewed and updated as legislation changes.

Section 4 Quality Management Policy

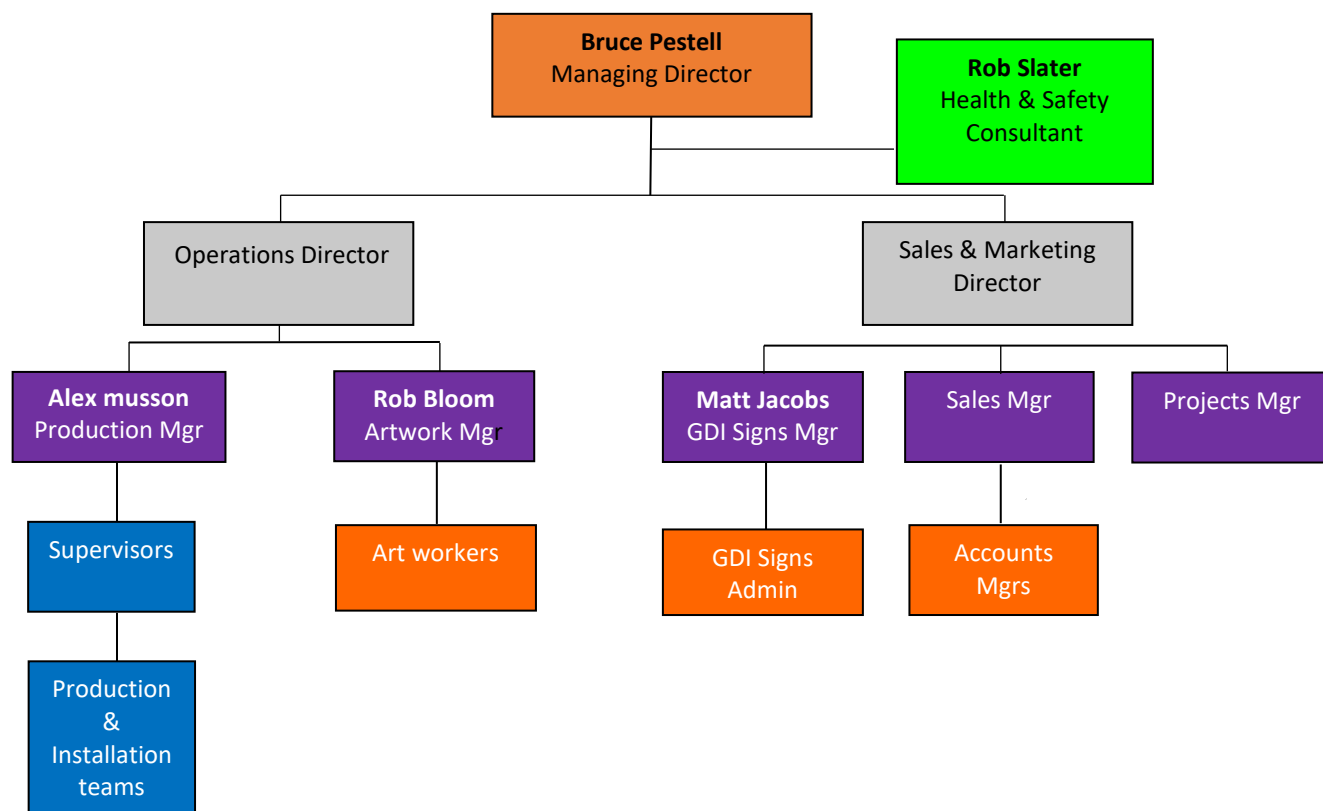
1. Introduction
2. Policy
3. Scope
4. Quality Plan
5. Review

1. INTRODUCTION

- 1.1. Graffiti Design / Gdi Signs specialise in the design, manufacture and installation of signage and has a vision to be synonymous with professionalism and innovation together with faultless and safe project delivery in every operational area.
- 1.2. Although the Company does not currently hold an ISO or equivalent quality accreditation, we meet all applicable statutory regulations and maintain an effective Quality Management System supported and operated by all members of the staff in order to achieve the specified objectives.
- 1.3. It is the Company's intention to continually strive for improvement in line with the principles of this policy and objectives set against said principles.

2. POLICY

- 2.1. It is the policy of Graffiti Design / Gdi Signs to provide bespoke signage and displays to a high product and service level, competitively and to defined timelines.
- 2.2. We will use high quality materials in order to meet provided specifications or to ensure that the product is fit for purpose.
- 2.3. We will maintain our costing structure in order to ensure that we remain competitive in the market place and provide good value for money.
- 2.4. We will manage each project efficiently and professionally in order to deliver on our time and budget promises.



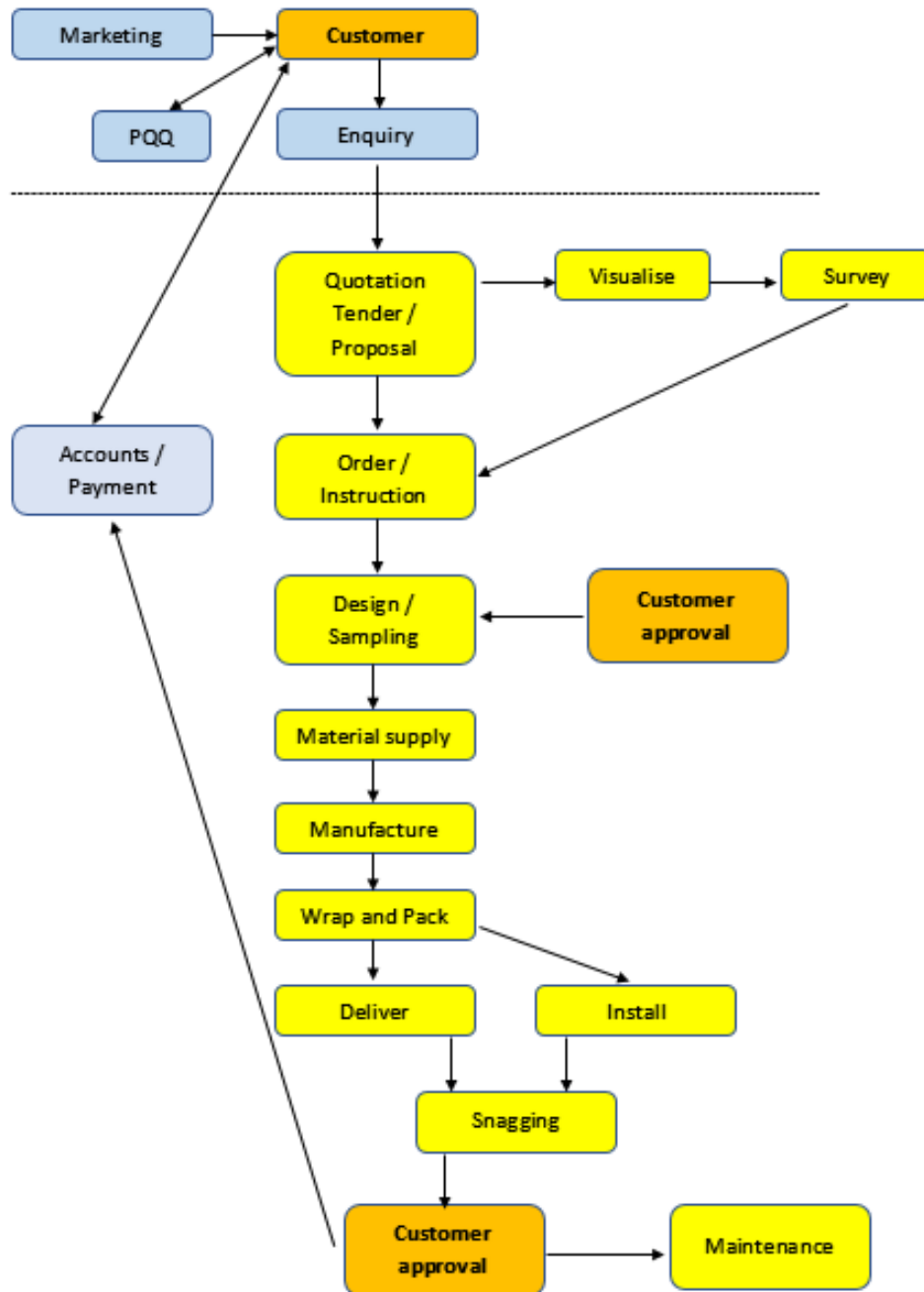
2.5 Our organisation chart

3. SCOPE

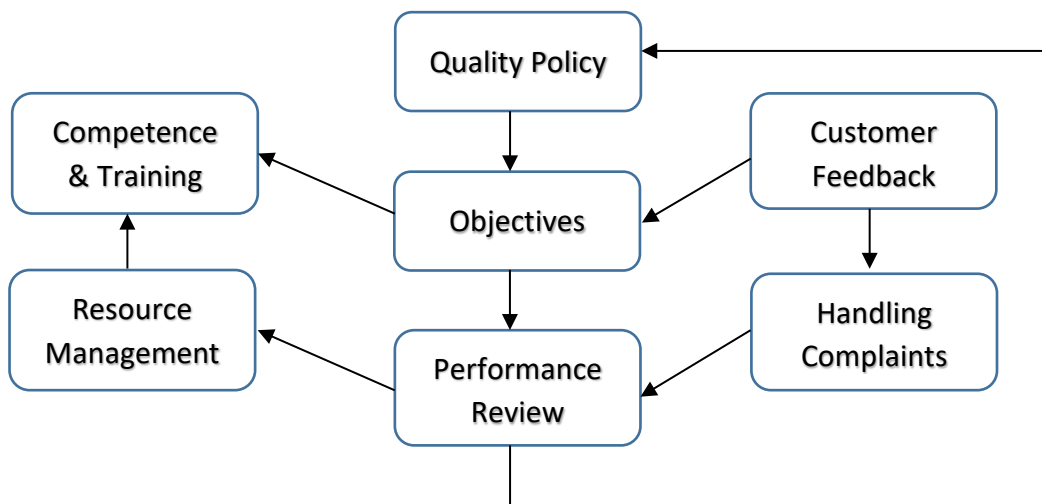
- 3.1. This policy applies to all aspects of the company's processes. All employees are required to comply with this policy when conducting day-to-day operational processes.
The scope of the Quality Management System covers the following activities:
- 3.2. The design, manufacture and installation of bespoke signage solutions.
- 3.3. The Company's approach to quality is based on three fundamental principles;
 - 3.3.1. Ensuring quality of service provision is based on the principle of everyone understanding how to do their job to the standard required, and doing it right first time.
 - 3.3.2. Ensuring that the Company has access to competent Health & Safety advice, then ensuring that all of our staff comply with our stated Health & Safety Policies
 - 3.3.3. A 360 degree service review process that encourages and uses feedback from our Clients and staff to continuously improve our service and provide recognition where appropriate for a job well done.
- 3.4. These principles are attained by:
 - 3.4.1. Ensuring our staff are fully trained and are kept up to date with any changes in standards.
 - 3.4.2. Using the services of Clearwater Safety Group to write our Health & Safety Policies and associated documents, and to provide us with advice as and when we need it
 - 3.4.3. Regular gathering and monitoring of Client feedback, including any complaints, via a formal complaints procedure.
 - 3.4.4. Training of staff through in-house training programmes and in conjunction with carefully selected external providers.
 - 3.4.5. Regular management reviews with all staff, including support staff.
 - 3.4.6. Clear internal communication through a streamlined management reporting structure.
 - 3.4.7. An annual, thorough internal and external audit programme.
 - 3.4.8. Awareness and training as appropriate in relevant changes to employment legislation which affect the delivery of our services.
 - 3.4.9. To ensure that our approach to quality is successfully implemented, the Directors will be responsible for identifying customer requirements and ensuring that correct procedures are adhered to in order to meet those requirements.
 - 3.4.10. The Company's management team is responsible for maintaining quality standards through conducting regular performance reviews / appraisals and providing training in line with staff needs.
 - 3.4.11. The Company's management team will also support processes that make it as easy as possible for all stakeholders to make complaints, provide feedback, make constructive suggestions and recognise good service.
- 3.5. The quality principles and related targets/objectives will be communicated to staff through day-to-day management, formal monthly review meetings and annual appraisals. Training will also be an integral part of the strategy to achieve quality policy objectives.

4. QUALITY PLAN

4.1. Process flow chart



4.2. Management Processes



4.3. Company Policies & Processes

4.3.1. A key element of the company's Quality Management System is the requirement to comply with our documented company policies and procedures which include:

- Health & Safety Policies and Procedures
- Environmental Policy
- Equality & Diversity Policy
- Modern Slavery Policy
- Data Protection Policy
- Anti-Bribery Policy

4.4.

Process	Process inputs	Process outputs	Controls	Records	Special tools etc	Planned improvements
Marketing/ telesales	Customer Database / Planning Portal / Media Generally	Increased awareness of Graffiti / Increase sales	Self Checking / Market research / Sales order book	Databases kept on 'Highrise' / Excel / MYOB databases	PC access to database	
Pre Qualification Questionnaire	Customer Request for PQQ	Completion of PQQ to provide satisfactory answers	Specific question asked / Self control	All PQQs saved for further use.	PC specific PQQ requirements	
Quotation	Customer Enquiry / Sales Lead	Quotation/ Proposal / Tender	Self Check / 3 rd Party Check / Automatic System	Copy of quotation – Electronic & Hard Copy	Quote Spreadsheet / Database / Client Database	
Visualisation	Customer / PM Request	Approval visual	Self and 3 rd Party check / Spell check	Copy retained – Electronic / Hard	PC / Various programmes / Artwork / Survey / Spec	
Survey	Customer Request / Address / Spec and detail	Full detail of site conditions / sizes / site restrictions / photographs	Self Checking / Cross check with approx measures and photos	Photos retained electronically / survey hard copy kept /	Vehicle / Sat Nav / Access Equip / Measures / Camera	

Process	Process inputs	Process outputs	Controls	Records	Special tools etc	Planned improvements
Order / Instruction	Customer Request	Production schedule set / Order Acknowledged / Value recorded	Account checks / Schedule limits set / Self checking	Order hard copy kept / Invoice raised / Sales order database	Account profiling / Schedule database	
Account Set up / Check	Customer Order	Account approval / Payment	Financial check / Terms agreed / Business Restrictions	Accounts / Credit card statement / secure details / Invoice copy	Bank checking system / Credit card system / MYOB	
Design / Sampling	Customer / PM request	Design drawing / sample product	Self and 3 rd party check	Copy retained electronically and hard / sample left with client or returned to office	PC / Various programmes / Artwork / Spec details / Survey detail	
Material Supply (or service)	Client / Stock order	Purchase order / delivery	Approved suppliers	Purchase order / delivery note	Suppliers quote	
Manufacture	PM Request	Finished product	Self and 3 rd Part checked / Final quality assessed by PM	Where possible photo of completed item / dispatch note	Materials / Spec / Details / All plant and machinery	

Process	Process inputs	Process outputs	Controls	Records	Special tools etc	Planned improvements
Wrap and Pack	Finished product	Delivery to client / site	Carrier controls / Sign off docket	Carrier invoice record / Electronic and hard copy of sign off docket	Carrier vehicles / Own vehicles / Hired in couriers	
Installation	Finished product	Completed installation	Risk assessment / Method statement / Sign off	Photographs of completed install where possible / Signed docket	Vehicles / Access plant / Hand and general tools	
Snagging	Snag list from client or client rep or from PM	Completion of all snagging to clients satisfaction	Self check / Client or client rep or PM check	Copy of install docket (completed) retention of snagging list	Installation equipment and plant / tools	
Maintenance	Customer Request	Maintenance of sign unit to increase life expectancy	Self check / client sign off	Copy of sign off docket retained / invoice submission & payment	General installation tools and access / cleaning equip	
Project Management	Customer or Stock Order / instruction	Full management of project to achieve on time on budget	Self Check / Full check throughout process /Auto checking	Works & purchase orders kept / schedule / sales order maintained	PC for works orders / Order system / H&S system	

5. Review

Our quality policy including all associated company policies are reviewed annually.

Section 5 Modern Slavery Policy

1. Introduction
2. Policy
3. Training

Modern Slavery Policy

1. Introduction

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Graffiti Design / Gdi Signs recognises that as a commercial organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We are also committed to ensuring as far as we are able that no-one in our supply chain uses child labour as part of their processes.

2. Policy

2.1. We undertake due diligence when considering taking on new suppliers, and where relevant we will be reviewing our existing suppliers. This due diligence includes:

2.1.1. Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.

2.1.2. Terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct.

2.2. We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

2.2.1. **Whistleblowing Policy** - we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature.

2.2.2. **Quality and Sustainability Agreement** - we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company's Quality and Sustainability Agreement will lead to the termination of the business relationship.

2.2.3. **Business Ethics Policy** - our policy sets out the core values which we expect to be observed throughout the Company. The policy specifically mentions the Act and is published in the Company handbook.

2.3. Training

2.3.1. The Company requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

2.3.2. Awareness training is provided for all main board members and entity directors and any other staff in relevant and appropriate roles.