

MODERN SLAVERY POLICY

Introduction

Slavery and human trafficking remains a hidden blight across our society, and as an organisation, we remain committed to responsible recruitment and careful selection of our suppliers in our supply chain. We are currently focusing on raising awareness amongst our employees and contractors to understand the requirements of the UK Modern Slavery Act 2015 on giving them tools to flag potential issues are sourced from respectable supply chains.

This policy sets out the Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Staff are expected to report concerns or questions immediately to management who will act upon them straight away.

Siderise strongly believes that the significant role we play in the communities in which we operate helps form a secure and resilient society. This means ensuring that slavery, servitude, forced labour and human trafficking is not tolerated in our operations or those of our suppliers which is a responsibility we take very seriously.

Scope

This procedure applies to all employees, workers, contractors, consultants or any self-employed individuals working for the organisation.

Localised legislation will be considered when applying this policy in international locations and the necessary amendments will be made. Please contact the HR Team for further information.

Policy Aims

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment 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.

Principles

Whistleblowing

Siderise encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Code of Conduct

Our Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Suppliers

Siderise is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Recruitment

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Due Diligence process for slavery and human trafficking

As part of our initiative to identify and mitigate risk:-

- we ensure that all new supplier initiatives are overseen by the appropriate appointed person;
- we ensure that where possible we build long standing relationships with local suppliers;
- with regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes;
- we have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to members of the management team. Should supply chain purchasing be delegated to another member of the team, they will receive suitable training.

Our Effectiveness in Combating Slavery and Human Trafficking

We will continually monitor our adherence to this policy by self-assessment and discussions with our supply chain.

How to raise a Concern

If you have any concerns in relation to anything detailed within this policy then please contact a Board member or a member of the HR Team.