

Modern Slavery Policy and Procedure

1. Introduction

- 1.1 This policy and procedure is discretionary in nature. Whilst Modular 500 Limited (M500) expects its employees and staff to comply with this policy, it does not confer contractual rights or form part of any contract of employment and maybe amended by the Company or replaced at any time following appropriate consultation.
- 1.2 Breach of this policy may be addressed via the M500's disciplinary and code of conduct policies.
- 1.3 This policy and procedure will be reviewed on a 3 year basis or amended in response to changes in future legislation and/or case law.

2. Ownership

The Human Resources Department owns and manages this policy on behalf of M500.

3. Organisational Scope

This Modern Slavery Policy and Procedure is a corporate policy and applies to all employees (and workers, as applicable) of M500, including any wholly owned subsidiaries, unless an alternative policy exists, subject to any qualifying conditions.

4. Definitions

Modern Slavery – includes slavery, servitude, forced and compulsory labour, human trafficking which deprive a person of their liberty in order to exploit for personal or commercial gain.

5. Policy Statement

- 5.1 Under the Modern Slavery Act 2015 modern slavery is a criminal offence. M500 is committed to ensuring that modern slavery is not taking place anywhere within our own business or in any of our supply chains.

- 5.2 M500 is committed to ensuring transparency in our approach to tackling modern slavery and to comply with disclosure obligations under the Modern Slavery Act 2015.
- 5.3 In employment of our own employees, we prohibit modern slavery or the hiring of individuals that are under 16 years of age. We fully comply with legislation applicable to the hiring and protection of employees within the workplace and compensation for work undertaken including Health and Safety legislation and minimum wage. M500 does not consider there is a risk of modern slavery being present in its directly employed workforce however we will regularly review our policies and practices.
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6. Key Principles

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- 6.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Managers must identify where additional training on modern slavery is required, for example where an employee is responsible to for managing partnerships.
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- 6.6 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary following needs analysis.

For the M500 external supply chain, if requested, training will be provided by the Procurement team.

7. Procedure

Human Resources

- 7.1 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.
- 7.2 Any employee who believes or suspects a breach of this policy or the Modern Slavery Act 2015 has occurred or that it may occur must notify their line manager, the Head of Procurement & Commercial Services or HR Department as soon as possible.
- 7.3 Employees who are unsure about whether a particular act, the treatment of workers more generally, or working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery can raise it with their line manager, Head of Procurement & Commercial Services or the HR Department.
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Procurement

- 7.5 Employees who are unsure about whether a particular act, the treatment of workers more generally, or working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery can raise it with their line manager, Head of Procurement & Commercial Services or the HR Department.
- 7.6 Through self-assessment, key suppliers are required to confirm agreement and compliance with this policy.
- 7.7 The Director of Operations, at his or her discretion, will implement appropriate audits of any key supplier on identification of potential risk.
- 7.8 M500 may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy or fail to allow the Head of Procurement & Commercial Services appropriate audit/assessment access.



MODULAR 500

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8. Reporting

M500 may provide an annual statement in compliance with the Modern Slavery Act 2015, following each financial year.

