

## **Modern Slavery Policy**

Demcom Ltd acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and within the suppliers of goods and services to the organisation.

We are committed to conducting business to the highest ethical standards and in compliance with all relevant legal principles as part of which we will seek to identify and remove any acts of modern day slavery and human trafficking within our business and from our supply chains, including sub-contractors and partners.

As part of the company's due diligence relating to slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.

Imported goods from sources outside of the UK and the EU and sub-contractors using migrant workers are potentially at higher risk from issues relating to slavery and human trafficking. The level of management control relating to these areas will be appropriate and monitored.

Demcom Ltd will not support or deal with any business knowingly involved with slavery or human trafficking.

## **Due Diligence**

Demcom Ltd have effective recruitment procedures in place systems to check that all employees have a 'right to work' in the UK and that we are fully compliant with the legislative requirement relating to this. These procedures safeguard against staff being forced to against their will or being trafficked and the use of child labour.

Our Modern Slavery and Human Trafficking policy statement is supplied to all new starters within the business and is available to all staff and interested parties on our website.

We also have a 'whistle blowing' policy which empowers all staff to report any concerns which may relate to slavery or human trafficking including:

- Failure to comply with a legal obligation or Statutes
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of the above

Over the last year we have incorporated the requirement of the Modern Slavery Act into our selection process for suppliers, especially in higher risk areas.

## **Effectiveness of the measures in place**

We are confident that we have identified the high-risk areas within our business and that the steps that we have taken to date have been adequate. We intend that the requirements of the Act will be further embedded in our procurement arrangements over the coming year. In doing this we will be raising awareness of the issue with companies who may not be directly regulated by the Act.

To date we have had no reports from employees, the public or agencies to indicate that any modern slavery practices have been identified or have occurred within the business or our supply chain.