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Document History:

Issue	Page No(s)	Date	Brief details of amendment(s) to procedure
1	All	21/11/2016	First issue of Data Privacy Policy
2	All	23/03/2022	Revised to include generic header and document history
3	All	27/03/2023	Revised following an annual review and to reflect business practices

1. Policy Statement

Storetec Services Limited is committed to understanding all modern slavery risks related to its business practices and put in place measures to ensure that modern slavery is not present in our own business or throughout our supply chain. We have developed this Modern Slavery Policy to outline our commitment to combating these issues and ensuring compliance with relevant laws and regulations.

As an ethical employer Storetec recognises that it has a responsibility to take a robust approach to slavery, human trafficking and exploitation. In addition to Storetec’s responsibilities as an employer, it also acknowledges its moral duty to notify the authorities of suspected victims of slavery or human trafficking as detailed by section 52 of the Modern Slavery Act 2015.

2. Responsibility

Ultimate responsibility for issues relating to Modern Slavery lie with Storetec’s board of directors (‘the board’). The responsibility for implementing and maintaining this policy lies with Storetec’s upper management team.

All of Storetec’s employees, contractors and suppliers are responsible for understanding and adhering to this policy, as well as all other relevant laws, regulations, and policies, including Storetec’s Supplier Code of Conduct.

3. What is Modern Slavery?

Modern Slavery is a term used to describe various forms of exploitation and coercion in which individuals are deprived of their freedom and forced to work under exploitative conditions. It includes practices such as slavery, forced labour, human trafficking, debt bondage, and child labour.

Under the Modern Slavery Act 2015, which applies to organisations operating in the United Kingdom, modern slavery is defined as:

Slavery: The condition of a person being owned or controlled by another person, treated as property, and forced to work or provide services against their will.

Forced Labour: Any work or services performed by an individual under coercion or threat, where they have not voluntarily offered themselves for the work.

Human Trafficking: The recruitment, transportation, transfer, or receipt of individuals by means of threat, force, deception, or other forms of coercion for the purpose of exploitation. This includes both domestic and international trafficking.

Debt Bondage: The use of debt or a loan as a form of coercion to force individuals to work in exploitative conditions.

Child Labour: The engagement of children in work that is mentally, physically, socially, or morally harmful, and interferes with their education and development.

4. Our Commitments

Storetec is committed to preventing slavery, human trafficking or exploitation in all of its business activities and to ensuring that its supply chains are free from slavery and human trafficking. We will do this by:

4.1. Risk Assessments

- a.) We will conduct a thorough risk assessment of our operations and supply chain to identify areas that may be at risk of modern slavery.
- b.) The risk assessment will consider factors such as geographic location, industry, and nature of the supplier's operations.
- c.) The risk assessment will be regularly reviewed and updated to ensure its effectiveness.

4.2. Supplier Due Diligence

- a.) We will implement robust due diligence processes to assess and monitor our suppliers' compliance with modern slavery laws.
- b.) New suppliers will be evaluated based on their commitment to combating modern slavery, including their policies and practices, and evidence will be requested wherever required.

- c.) Existing suppliers will be periodically assessed to ensure ongoing compliance.
- d.) Where suppliers are found to be non-compliant, we will work with them to address the issues and support their improvement. However, if a supplier fails to demonstrate a commitment to eradicating modern slavery, appropriate actions, including termination of the business relationship, may be taken.

4.3. Recruitment

- a.) Storetec's recruitment processes are transparent and reviewed regularly by the Senior Management Team. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.
- b.) Storetec expects all employees to demonstrate the highest standards of conduct and behaviour. All breaches are investigated by the Senior Management Team. Storetec recognises its responsibility to develop, implement and monitor policies and procedures within its supply chain to safeguard against the exploitation of underage workers and vulnerable adults.

4.4. Employee Awareness and Training

- a.) We will provide training to our employees to raise awareness about modern slavery and the importance of identifying and reporting any suspected cases.
- b.) Training programs will be tailored to the specific roles and responsibilities of employees.
- c.) Employees will be encouraged to report any concerns or suspicions related to modern slavery through appropriate channels.

4.5. Reporting and Whistleblowing

- a.) Storetec encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chain of Storetec.
- b.) Storetec's Code of Conduct covers the whistleblowing procedure and it is designed to make it easy for employees to make disclosures, without fear of retaliation. All matters raised will be investigated thoroughly by the Senior Management Team.

- c.) We will establish effective reporting mechanisms to encourage employees, suppliers, and other stakeholders to report any instances of modern slavery.
- d.) Whistleblower protection measures will be in place to ensure individuals who report in good faith are protected from retaliation.
- e.) All reports will be treated confidentially, and appropriate actions will be taken to investigate and address reported cases.

4.6. Continuous Improvement

- a.) We are committed to continuously improving our policies and practices to combat modern slavery.
- b.) We will monitor and review our compliance with this policy on a regular basis.
- c.) Feedback and recommendations from employees, suppliers, and other stakeholders will be actively sought and considered for improvement.

4.7. Communication and Transparency

- a.) This Modern Slavery Policy will be made readily available to all employees, suppliers, and stakeholders.
- b.) We will communicate our commitment to eradicating modern slavery to our stakeholders through various channels, such as our website, contracts, and reports.

Signed:



Damien Baker,
Chief Operating Officer