

Pexhurst Services Ltd Modern Slavery Act 2015 Policy Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that Pexhurst Services Ltd has taken and will be taking to ensure that slavery and human trafficking is not taking place in any part of our business, or that of our supply chain.

The Company’s reputation for lawful and responsible business behaviour is of paramount importance and is one of our greatest assets.

Pexhurst Services Ltd is committed to the prevention, deterrence, and detection of modern-day slavery/trafficking within our organisation or supply chain and has zero tolerance towards such behaviour.

The Modern Slavery Act consolidates slavery and trafficking offences and introduces tougher penalties and sentencing rules.

It ensures that the main offences are subject to the toughest asset recovery regime under the Proceeds of Crime Act 2002, introduces bespoke slavery and trafficking compensation orders, and provides for the confiscation of vehicles, ships and aircraft used for the purposes of trafficking.

The act includes provisions to:

- Enable the Secretary of State to make regulations relating to the identification of and support for victims
- Make provision for independent child trafficking advocates
- Introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- Close gaps in the law to enable enforcement officers to stop boats where slaves are suspected of being held or trafficked
- Require businesses over a certain size (turnover £36m or more) and threshold to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chain.

Pexhurst Services Ltd will ensure that the following additional procedures are considered to prevent slavery/trafficking:

Pexhurst Services Ltd - Internal Procedure

Protecting our Employees

All our new employees are subject to pre-employment checks to confirm their identity and right to work in the UK prior to them starting work at Pexhurst Services Ltd. Information is provided to all employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to by virtue of their employment.

Where recruitment agencies are used, we ensure they comply with all legal requirements. These procedures collectively help to address our on-going commitment to protect our employees’ human rights and the elimination of all forms of forced and compulsory labour.

Engage and train staff – We have developed an ‘Anti-Slavery and Human Trafficking Standard’, setting out an introduction to the Act and its impact on our employees. Through our internal training and induction programmes and internal communications programmes, staff are encouraged to identify and report any potential breaches of the Standard.

We nominate a champion(s) to educate the business stakeholders at the right levels and use this statement as a communication tool to raise awareness of the impact an individual decision can have on ethical procurement.

Any employee of Pexhurst Services Ltd who has knowledge or suspects that human slavery or trafficking is taking place either in our organisation or supply chain, will be expected to report this directly to the Managing Director or another Director.

Pexhurst Services Ltd will immediately ask for the Company or individual to be removed from either the company or supply chain, on the grounds of gross misconduct, and they will be reported to the relevant authorities.

Pexhurst Services Ltd - External Procedure

Pexhurst Services Ltd Procurement's Role – Supply Chain/Buyers, Managers, Line Managers, Surveyors, Estimators etc. (All those procuring materials/labour)

Those procuring products, materials, or labour on behalf of Pexhurst Services Ltd must ensure as far as reasonably practicable that they know the source or origin of each product, to ensure no slavery or trafficking has been used.

We have an important role to play in sourcing in a manner that enables and rewards suppliers for good employment practices, rather than purchasing in a manner which drives the use of modern-day slavery/trafficking practices.

We expect our suppliers to support and demonstrate our values, which are essential components of our approach to Corporate Social Responsibility.

Pexhurst Services Ltd will ensure its Supply Chain are aware of this policy, and will ask where applicable as part of the tendering process for each company to provide:

- a) The organisation's structure, its business, and its onward supply chains.
- b) Their policies in relation to slavery and human trafficking.
- c) Their due diligence processes in relation to slavery and human trafficking in its business and supply chains in relation to:
 - The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.
 - Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supplychains, measured against such performance indicators as it considers appropriate.
 - Training about slavery and human trafficking available to their own staff.

The standards we expect from our supply chain is that they address a broad spectrum of working conditions including fair remuneration, working hours, no child labour, respect, non-discrimination, health safety and wellbeing, as well as freedom from forced labour.

We will assess any instances of non-compliance on a case-by-case basis, taking any remedial action accordingly.

We will not progress to working with any supplier which does not comply with the Modern Slavery Act.

We believe that the risk of slavery and human trafficking within our own organisation is substantially mitigated as a result of our strong collective sense of vision and purpose, our cultural values and commitment to ethical behaviour, supported by our policies and procedures.

However, we are not at all complacent and recognise that there is always more that can be done. We will continuously seek to develop our practices where possible and to work with our suppliers and contractors to be as certain as we can that they hold the same values as us.

This policy statement applies to all Employees, Sub-Contractors and Supply Chain Partners at all times.

Signed:

A handwritten signature in blue ink, appearing to read "M. V. V. V.", written over a horizontal line.

Dated: 07/12/2023