


Policy No.:	POL012	<b>Forced labour – Modern Slavery Policy</b>		
Version:	3	Co-ordinator:	RH	
Date:	10/02/23	Authoriser:	BP	
Version Details:	Reviewed 10/02/25			

## Forced Labour – Modern Slavery Policy

### Policy Statement

Saraco Industries Ltd commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

### Scope

This policy applies to our Farnworth Site

### Responsibility

Badr Patel – has overall responsibility for this policy

### Policy Commitments


#### A. COMMITMENT to tackle modern slavery risks within your business

1. Badr Patel has overall responsibility for tackling modern slavery risks within the business, Rhiannon Hurd and Mohsin Ahmed have responsibility for ensuring suppliers are compliant.
2. Badr Patel has completed the Stronger together Modern Slavery training course with this knowledge alongside the online stronger together resources Saraco Industries Ltd is building capacity to help prevent and address modern slavery risks.
3. Saraco Industries Ltd has implemented several policies to help prevent and address modern slavery risks; including Anti-Bribery and Corruption Policy, Ethical Policy, Grievance Policy, New Supplier/Contractor questionnaires and an anonymous worker suggestion box.

#### B. ASSESSMENT of modern slavery risks within the business

1. Saraco Industries Ltd will use a combination of the training provided by Stronger together and New Supplier questionnaire responses to monitor and understand where the risks of modern slavery may come from. Saraco Industries Ltd actively encourages workers to report issues by the displaying of the Stronger together posters on site, the anonymous worker suggestion box and via the worker representative. Any issues arising will be dealt with confidentially and passed to the appropriate authorities for action.

#### C. Action to prevent and deal with identified risks of modern slavery

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1. All employees are to be issued with a copy of the stronger together- tackling hidden labour exploitation poster which will help to raise awareness of situations that are considered modern slavery.
2. Staff dealing with recruitment and management teams to be trained in the risks of modern slavery and how to help prevent and deal with any situation arising.
3. When recruiting new workers, we will require them to complete the Worker Questionnaire to assess if there's a risk of modern slavery F0065.
4. Worker questionnaires will be placed next to the anonymous suggestion box for completion by employees. The completed questionnaire will then be assessed for any 'red flags'.
5. When recruiting potential employees if using a recruiter, the recruiter will be required to sign the Recruiter Compliance Principles – D0005.
6. Site contractors are kept to a minimum, where contractors are used, we ask to see a copy of their modern slavery policy.
7. For reporting of potential modern slavery issues we have the anonymous suggestion box for workers, and the stronger together posters on the notice board with the relevant helpline numbers and contact information.

#### **D. Responding to protect and provide remedy for victims of modern slavery within our business**

##### **1. Saraco Response plan**

- All potential indicators will be investigated, those beyond our remit will be passed on to the relevant authorities
- Any concerns found by a Saraco Internal investigation will be passed to relevant authorities
- Any reporting will be treated in the strictest confidence
- Employees will be provided with a mutually chosen representative for support in the workplace
- Employees will be guided to the Victim support help numbers recommended by Stronger Together

##### **2. Saraco Remediation Policy**

- Employees will be guided to the Victim support help numbers as mentioned above recommended by Stronger Together.
- Any employee found to be exploiting any other member of staff will be immediately dismissed and reported, to ensure the affected member of staff can feel safe within the work place.
- Any affected employee will be allowed time off to attend meetings with a counsellor, legal representative or relevant appointments.

#### **E. Monitoring of Progress to prevent, respond and remediate the risks of Modern Slavery within the Company.**

1. The Modern Slavery Policy and related documentation will be reviewed on an annual basis to assess the effectiveness in prevention of modern slavery and any issues that arise.

#### **F. Communication of steps to prevent, respond and remediate the risks of Modern Slavery within the Company**

1. Saraco Industries Ltd introduces the Stronger together organisation as part of the company induction package on starting employment, the modern slavery workers questionnaire is provided in the canteen – where there are no security cameras and the workers anonymous suggestion box is situated.



**Badr Patel**  
Operation Director