



# Modern Slavery Policy

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# 1. Introduction

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Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy sets out PQShield's commitment to ensure transparency in our approach to tackling modern slavery in our business and throughout our supply chains. It also aims to ensure that all colleagues and teams within PQShield act ethically and with integrity in all our business dealings and relationships.

## 1.1. What is Modern Slavery?

Modern slavery is when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. Modern slavery can manifest in various forms within the corporate world, including:

- **Forced labour in supply chains:** Companies may knowingly or unknowingly source products or materials from suppliers that engage in forced labour. This could involve workers being coerced or deceived into working under exploitative conditions, with little or no pay.
- **Exploitative working conditions:** Companies may subject their employees to exploitative working conditions, such as excessively long hours, unsafe working environments, and inadequate pay or benefits. This can occur in various industries, including manufacturing, agriculture, and construction.
- **Human trafficking for labour:** In some industries, individuals may be trafficked and forced to work against their will. They may be subjected to physical and psychological abuse, threats, and coercion to keep them in servitude.
- **Debt bondage:** Companies may engage in practices that trap workers in debt bondage, where they are forced to work to repay debts that are impossible to settle due to inflated fees and expenses imposed by their employers.
- **Child Labour:** Child labor still exists in various parts of the world, particularly in industries such as agriculture, garment manufacturing, and mining. Children may be forced to work in hazardous conditions and denied access to education and basic rights.

## 1.2. Applicability

This policy applies to all staff, including employees, contractors and interns working for or under the control of PQShield.

# 2. Policy Statement

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## 2.1. Principles

PQShield does not tolerate any form of modern slavery - whether that be within the company itself, its supply chain or its customers. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

PQShield is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We will therefore comply with this Act and any other relevant legislation on the matter.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## 2.2. Responsibilities

Role	Responsibility
Management Team	Has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
Managers at all levels	Are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
Compliance Team	Has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
All colleagues	Reporting any suspected breaches of or conflicts with this policy.

## 2.3. What You Need to Do

- All colleagues must read, understand, acknowledge and comply with this policy.
- In addition, training on modern slavery is included as part of the mandatory induction courses for new joiners.
- You must notify the Compliance Team as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future - be that in any part of our business or supply chain.

## 2.4. What PQShield is Doing

- PQShield has implemented this policy, and will ensure that it is followed.
- We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- When we hire people at PQShield we make sure everyone is legally entitled to work, eligible for their proposed roles and has applicable background checks. We monitor this throughout their employment.
- Written employment contracts lay out people's rights and responsibilities, and we take care to make sure everyone at PQShield is aware of their rights to sick pay, holiday pay and other benefits.

- As part of attracting new people to PQShield and engaging our existing workforce we pay employees and contractors a fair, competitive salary.

## **2.5. Managing Our Suppliers**

We take a zero tolerance approach to modern slavery in our supply chain and all suppliers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

To the best of our knowledge, there have been no incidents of modern slavery or human trafficking associated with businesses we work with. In this context, we oversee the monitoring of existing suppliers, and the selection of new suppliers through our Supplier Management Policy and Risk Framework.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control, and any suspected breaches must be reported to your line manager.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our supply chain constitutes any of the various forms of modern slavery, you are encouraged to raise it with the Compliance Team.

## **2.6. Our Customers**

As part of our Export & Trade Policy, PQShield has a strict screening policy in place whereby we search for and review any historical sanctions, legal and regulatory breaches and negative press, before accepting and onboarding customers.

## **2.7. Proceeds of Crime**

Any commercial gains from acts of modern slavery are proceeds of crime. PQShield operates a Tax Evasion Policy & Anti-Money Laundering Policy which outlines our approach to preventing and dealing with this matter.

# **3. Compliance and Monitoring**

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- Compliance with this and all other policies and procedures is mandatory;
- Any breach of policy may result in disciplinary action, up to and including dismissal.

## **3.1. Monitoring**

Compliance to the processes and guidance contained within this policy will be highlighted through notification of any Information Security and other Governance breaches whereby an investigation will identify non-compliance and then seek to understand and address the reasons for non-compliance.

## **3.2. Audit and Review**

### **3.2.1. Internal Review**

Compliance with this policy will be monitored through Information Security Internal Audits, and by other management checks as required.

### **3.2.2. External Review**

Inspections by external auditors may be carried out from time to time.

As part of these activities, external inspectors may ask to view internal records. Supervised access to such records must be provided where requested.

Copies of records must not be retained by an inspector unless this has been specifically approved by the CEO or VP Operations.

### **3.3. Policy Review**

This policy will be reviewed by the CEO or their nominated delegate at regular intervals, not exceeding one year, or when business changes warrant it as part of the continual service improvement process.