

## ANTI-SLAVERY POLICY

### 1. Policy Statement

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. Arville have a zero-tolerance approach to modern slavery and 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.

We are 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 expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, contractors, external contractors, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. Responsibility for the Policy

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Manager 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.

### 3. Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and report of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains or any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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

We aim to encourage openness and 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

#### 4. Communication and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training to relevant employees. Training also forms part of the induction process for all individuals who work for us.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationships with them.

For transparency, the company will publish this Anti-slavery policy on its website for its employees, suppliers, customers and business partners to view.