



## **Anti Slavery and Human Trafficking Policy**

**Last Update: August 2024**

Annington Limited

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Annington Limited, together with its subsidiaries and affiliates (“Annington”, the “Company”, “we”), is committed to acting with collaboratively and integrity in all our business dealings.

## 1. INTRODUCTION

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Forms of modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person’s will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.

Annington Limited (“Annington”) strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

## 2. POLICY STATEMENT

Annington expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy.

We are committed to gaining a clearer understanding of how modern slavery operates in different contexts, of who is affected and how, and of the risks of modern slavery existing within our industry.

We are committed to engaging with our stakeholders and direct suppliers to address the risk of modern slavery in our operations and supply chain.

As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties’ agreement to adhere to the Code of Conduct.

## 3. POLICY APPLICATION

This Policy applies to all persons working for Annington or on behalf of Annington in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

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

Workers must ensure that they read, understand and comply with this Policy.

## 4. RESPONSIBILITY FOR THE POLICY

Annington's Board of Directors has approved this Policy, and is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.

The Director of Projects and Sales has responsibility for ensuring that the contractors and suppliers used in the refurbishment of properties comply with Annington's policies, including our Anti-Slavery and Human Trafficking Policy. The Chief Operating Officer, David Tudor-Morgan has responsibility to the Annington board for oversight of the Act across the Group

Management at all levels are responsible for ensuring 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.

You are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Operating Officer.

- An application will be made in writing (via email) to the employee's manager detailing what the employee wishes to do and why, with whom he/she wishes to do it, the location of the volunteering and the dates on which the volunteering will take place.
- The manager is required to authenticate and approve the application (including verifying the authenticity of the organisation).
- Once completed, the employee is requested to submit a short report on their volunteering activity with a focus on what they contributed/achieved and what they have gained from the experience.

This Policy may be updated from time-to-time to reflect a change in circumstance, organisation or strategy of the Company or of those to whom the Company is providing charitable support.

Any changes will be recommended for adoption by the Committee and approved by the Board of Directors.

## 5. REPORTING MODERN SLAVERY

Employees must notify their line manager OR the Chief Operating Officer as soon as possible if they have any reason to believe that modern slavery of any form may exist within Annington or its supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this Policy. Alternatively, employees may raise concerns confidentially with Human Resources.

If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within Annington or its supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this Policy, they must notify as soon as possible the Chief Operating Officer or Human Resources.

Annington aims to encourage openness and will support anyone who raises genuine concerns under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any

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detrimental treatment as a result of reporting 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 Chief Operating Officer immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure, which can be requested from Human Resources.

## 6. BREACHES OF THE POLICY

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Annington may terminate its relationship with other individuals and organisations working on behalf of Annington if this Policy is breached.

**DOCUMENT DETAILS**

<b>Policy Number</b>	ANN-POL-004	<b>Version No</b>	V.1.3
<b>Effective Date</b>	April 2016	<b>Last Reviewed</b>	August 2024
<b>Policy Owner</b>	Head of Legal	<b>Policy Approved By</b>	Annington Ltd Board

**Internal Compliance Version Only**  
**VERSION HISTORY**

<b>VERSION</b>	<b>AUTHOR</b>	<b>REVISION DATE</b>	<b>CHANGES</b>
V.1.0	HR	April 2016	Policy creation
V.1.1	Director of Strategy and Communications	May 2019	References to NGA Advice Line. Removed and Annington Human Resources added. Removed 'in good faith' in line with legislation.
V.1.2	Director of Strategy and Communications & Head of Legal	March 2022	Incorporated new section 2.2. from Eversheds LLP.
V.1.3	Head of Legal	August 2024	Updated title references to Commercial Director with Chief Operating Officer.

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