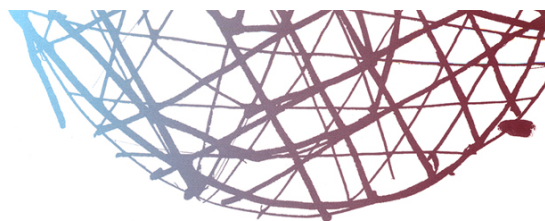


# Abstract Group of Companies Modern Slavery Policy



## 1. INTRODUCTION

- 1.1. The Abstract Group of Companies (“the Company”, “we”) is committed to acting ethically and with integrity in all our business dealings and has a zero-tolerance approach to modern slavery.
- 1.2. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.
- 1.3. We are committed to compliance with all relevant legislation, including but not limited to, the Modern Slavery Act 2015 (“the Act”).

## 2. SCOPE AND PURPOSE

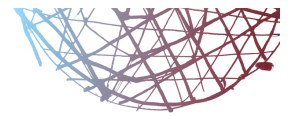
- 2.1. This policy governs all our business dealings and applies to all persons or organisations who are appointed to act on behalf of the Company or any of its subsidiaries including, but not limited to, employees, directors, agents, contractors, business partners and consultants.
- 2.2. The purpose of this policy is to:
  - 2.2.1. Set out responsibilities for observing and upholding this policy;
  - 2.2.2. Provide information about modern slavery including how to prevent it; and
  - 2.2.3. Establish standards of conduct so as to ensure that the Act is not violated.

## 3. DEFINITIONS

- 3.1. **Modern slavery** is a crime and a violation of fundamental human rights. It takes many forms, such as slavery, servitude, forced labour and human trafficking, all of which involve deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. References to “modern slavery” throughout this policy include all these forms.
- 3.2. **Slavery** – where ownership is exercised over a person; or if an offender behaves as if they own the person, which deprives the victim of their freedom.
- 3.3. **Servitude** – an obligation to provide services that is imposed by the use of coercion.
- 3.4. **Forced or compulsory labour** – any work or service that is exacted from any person under the menace of any penalty (including coercion, direct threats of violence or more subtle forms of compulsion), and for which the person has not offered themselves voluntarily.
- 3.5. **Human trafficking** – the use of violence, threats, coercion, deception or other means to transport, recruit or harbour people in order to exploit them.

## 4. RISK

- 4.1. The principal areas of risk we face related to modern slavery, include, but are not limited to, recruitment and supply chains.
- 4.2. We are also conscious that the construction sector has been identified as a high-risk industry for modern slavery and associated issues.
- 4.3. We will monitor these risks and update this policy as required if they change.



## 5. PRINCIPLES AND PRACTICE

5.1. **At all times, business should be conducted in a manner such that any opportunities for, and incidences of, modern slavery are prevented.**

### 5.2. **Recruitment**

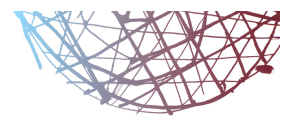
- 5.2.1. We use direct in-house recruitment which includes face-to-face communications with applicants;
- 5.2.2. We confirm identities and ensure employees are legally able to work in the UK by checking originals of relevant identification documents;
- 5.2.3. We ensure all payments are made directly into a personal bank account, which is in the employee's name; and
- 5.2.4. We provide all employees with a written contract of employment which includes information on their statutory rights such as sick pay, holiday pay and other benefits.

### 5.3. **Supply Chain**

- 5.3.1. We endeavour to account for each step of our supply chain to ensure we know who is providing goods and services to us;
- 5.3.2. We inform members of our supply chain that we are not prepared to accept any form of modern slavery or exploitation, and implement processes to ensure, as far as reasonably practicable, that they adhere to our expectations within their own workforce;
- 5.3.3. We require our supply chain to demonstrate the steps they are taking to ensure modern slavery is not taking place within their own businesses and supply chains; and
- 5.3.4. Our supplier contracts contain specific prohibitions against the use of any form of modern slavery, and we expect that our suppliers will hold their own suppliers to the same high standards.

## 6. BREACHES AND REPORTING

- 6.1. **Reporting** – employees must notify the Group Chief Executive as soon as possible if they believe, or suspect, that a breach of this policy has occurred or may occur in the future, or if they have any concerns regarding modern slavery. Non-employees must notify their normal point of contact at the Company.
- 6.2. **Consequences** – any alleged breach of this policy by an employee will be investigated and could result in disciplinary action up to, and including, dismissal. The Company may terminate its contractual relationship with suppliers, contractors, partners, or associates if they breach this policy. The police will be notified of allegations where criminal activity may have taken place and the Company will co-operate fully with any external investigations.
- 6.3. **Protection** – the Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that actual or potential modern slavery of any form is taking place, or may in the future, in any part of our business or supply chain. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, or our Whistleblowing Policy, even if they turn out to be mistaken.



## 7. TRAINING AND COMMUNICATION

- 7.1. Communication of this policy, and the risks our business faces from modern slavery, forms part of the induction process for all employees, and regular training will be provided as necessary.
- 7.2. Our zero-tolerance approach to modern slavery, including this policy, is communicated, where applicable, at the outset of our business relationship with clients, suppliers, contractors and business partners, and reinforced as appropriate thereafter.

## 8. RESPONSIBILITIES

- 8.1. **The Board of Directors** is responsible for:
  - 8.1.1. Ensuring this policy complies with the Company's legal and ethical obligations.
- 8.2. **The Group Chief Executive** is responsible for:
  - 8.2.1. Primary and day-to-day implementation of this policy;
  - 8.2.2. Ensuring this policy is communicated to, understood and observed by employees; and
  - 8.2.3. Ensuring that third parties who carry out activities on behalf of the Company understand the requirements of this policy.
- 8.3. **All those listed in clause 2.1.** are responsible for:
  - 8.3.1. Reading, understanding and complying with this policy;
  - 8.3.2. Exercising due diligence at all times when dealing with third parties;
  - 8.3.3. Reporting any and all concerns relating to modern slavery, as outlined in clause 6.1.; and
  - 8.3.4. Avoiding any activity that might lead to, or suggest, a breach of this policy.

## 9. MONITORING AND REVIEW

- 9.1. The Company will monitor and update this policy as necessary to ensure its suitability, adequacy and effectiveness, and it will be reviewed by the Board of Directors every three years.

## 10. CONTRACTUAL STATUS

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