

Modern Day Slavery Policy

HR-POL-026-02

1. Purpose

Statom Group is committed to ensuring that modern slavery and human trafficking do not occur within our business or supply chains. This policy outlines our commitment to preventing, identifying, and addressing any risks of modern slavery and aligns with the UK Modern Slavery Act 2015.

2. Scope

This policy applies to all employees, contractors, suppliers, and business partners of Statom Group. It encompasses all aspects of our operations and extends to our entire supply chain.

Definitions

- **Modern Slavery:** Encompasses slavery, servitude, forced or compulsory labour, and human trafficking.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, use of force, coercion, abduction, fraud, deception, abuse of power, or vulnerability.

Policy Statement

Statom Group has robust safeguards against modern slavery and is dedicated to acting ethically and with integrity in all business dealings. We will strive to ensure transparency in our operations and that our suppliers and contractors adhere to the same standards.

Responsibilities

- **Board of Directors:** Responsible for ensuring that modern slavery risks are understood and managed and that the policy is implemented effectively.
- **Management:** Responsible for communicating this policy, training employees, and monitoring compliance.
- **Employees:** All employees are required to adhere to this policy and report any concerns regarding modern slavery practices.

Procedures

1. Risk Assessment

- Statom Group will conduct regular assessments of the risk of modern slavery in our operations and supply chains.
- High-risk areas will be identified and monitored, including industries and geographic locations known for higher incidences of modern slavery.

3. Supplier Due Diligence

- All suppliers and contractors will be required to complete a due diligence questionnaire to assess their commitment to preventing modern slavery.

- Contracts with suppliers will include clauses requiring compliance with the Modern Slavery Act and the right to audit.

4. Training and Awareness

- Statom Group will provide training for employees to ensure awareness of modern slavery risks and the reporting process for suspected incidents.
- Training will include guidance on identifying signs of modern slavery and the appropriate channels for reporting concerns.

5. Reporting and Whistleblowing

- Employees and stakeholders are encouraged to report any concerns or suspicions of modern slavery without fear of retaliation.
- Reports can be made to a manager, HR, or through an anonymous reporting mechanism established by Statom Group.

4.1 Monitoring and Review

- This policy will be reviewed annually to ensure its effectiveness and compliance with legal requirements.
- Statom Group will monitor the effectiveness of this policy and make improvements as necessary based on feedback and emerging best practices.

Compliance

Statom Group is committed to complying with the UK Modern Slavery Act 2015 and all other applicable laws and regulations. Any breach of this policy may result in disciplinary action, including termination of employment or contracts.

Approval

This policy has been approved by the Board of Directors of Statom Group and will be reviewed annually.

SIGNED:



Martina Oyite
Human Resources Director
Statom Group Limited
REVIEW: Annual
DATE: 01/06/2025
NEXT REVIEW: 01/06/2026

SIGNED:



Paul Whelan
Managing Director
Statom Group Limited
REVIEW: Annual
DATE: 01/06/2025
NEXT REVIEW: 01/06/2026