

## **Corporate Policy on Modern Slavery and Human Trafficking.**

221B Group Ltd is committed to maintaining and enforcing effective systems and controls to ensure compliance with Modern Slavery Act 2015

We recognise modern slavery is a criminal activity and a violation of human rights. The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain is unacceptable. For these reasons, slavery and human trafficking is a matter of zero tolerance within the company and endorsed by this Policy.

It is our approach to comply with all laws and regulations relevant to our business in which we operate to and endeavour to ensure slavery, servitude and forced or compulsory labour is not taking place anywhere within our own business, our contractors we use and in any of our supply chains.

We undertake all reasonable and practical steps, including a vigorous contractor and supplier approval process to ensure our approach is reflected in that of the organisations that we are working with or associated with.

To ensure that our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with by using agile inspections and audit.

We operate a whistleblowing policy and system to allow concerns to be raised sensitively and we will assess any instances of non-compliance on a case-by-case basis and will take appropriate remedial action.

This Policy applies to all members, employees, agents, consultants and those parties in our supply chain, wherever in the world they operate. Any reported breach of this Policy will be investigated and may lead to contractual termination.

Mark Thorne

**Operations Director** 

221B Group Ltd

Issued 2023

This statement has been approved by our Board of Directors, who will review and update it as necessary on an annual basis or when there are legislation amendments.