

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery Statement

INTRODUCTION

This Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) relating to Transparency in Supply Chains.

This statement sets out the steps Montracon Limited continues to take to address the risk of slavery and human trafficking within its operations and supply chain.

ORGANISATIONAL STRUCTURE

Montracon Limited, operates primarily in the United Kingdom with its registered office in Doncaster, South Yorkshire.

The subsidiary business units, autonomous organisations with their own Boards of Directors, draw on support centrally from Montracon Limited in respect of health and safety, the environment, legal counsel, human resources, property, IT, insurance and finance.

The organisations recognise their responsibility to take a robust approach to slavery and human trafficking. The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

Countries of Operation and Supply

Montracon Limited now operates in the United Kingdom and Ireland. Previous operations in France, Italy, Germany, and Poland no longer fall under the scope of this policy.

Montracon Limited remains committed to review and evaluate the supply chains to identify human trafficking risks and slavery risks and we continue to review all aspects of the supply chain function from start to finish. Montracon Limited remains committed

to ensuring there is no modern slavery or human trafficking in its supply chain or in any part of its business units with a zero tolerance for non-compliance.

The procurement of services and supplies is undertaken professionally by supply chain and or procurement specialists within the central supply chain function working in conjunction within the autonomous business units. It is our intention to maintain long term relationships with customers and suppliers encouraging collaborative working and good industry practice.

As a business we continue to support the Stronger Together Programme, and fully endorse the work being done to reduce forced labour and human trafficking in the UK and across the world. Employees and or agency staff have received training in the Stronger Together principles around modern-day slavery and human trafficking.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Montracon HR Department
- **Risk assessments:** Group Procurement Team
- **Investigations:** Group L&C Director
- **Training:** Montracon HR Department & BU Team

Relevant policies

Montracon Limited is committed to ensuring there is no modern slavery or human trafficking in its supply chain or in any part of its business with a zero tolerance for non-compliance.

This statement reflects that commitment to acting ethically in all business units and to establishing an effective system to ensure slavery and human trafficking is not happening in the supply chains. Montracon Limited operates under a number of policies, which underpin our ethical approach to business, and which will assist in preventing modern slavery in our supply chain:

- **Whistleblowing policy** – Montracon Limited encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise

to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact lucy.watkinson@montracon.com

- **Employee code of conduct** – Montracon Limited's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The focus of the organisation is within the Borders of the United Kingdom and Ireland. When applicable the organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier code of conduct** – Montracon Limited is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment policy** – Montracon Limited has its own inhouse recruitment team and uses only specified, reputable employment agencies to source labour and where not possible seeks to verify the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on supply chain mapping
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;

- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular as evidenced by our participation in “Stronger Together” initiatives;
- Invoking sanctions against suppliers who fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship;

Performance indicators

Montracon Limited continues to review its key performance indicators around modern slavery and human trafficking. As a result, the organisation is:

- requiring all staff working in procurement and HR to have completed training on modern slavery;
- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

Recruitment & Training

Montracon Limited undertakes selective pre-employment screening, references, conducts identity checks and confirmation of entitlement to work in the United Kingdom on all employees prior to commencement of employment. These measures have extended in 2020.

New employees are given an overview of the essential policies and information in relation to Montracon Limited policies, procedures and other matters such as whistle blowing, dignity at work, and equality. Looking ahead the introduction of a centralised H&S and HR online training portal and employee engagement platform has heightened levels of awareness, information and communication. We envisage the development of a centralised dashboard to provide uniformity and heightened visibility to management teams around right to work, employment and employee training. For all employees the ongoing process of training and communication around modern slavery and human trafficking will continue unabated utilising the very effective resources provided by Stronger Together across all media formats.

Awareness-raising programme

As well as training specific staff, the organisation has raised awareness of modern slavery issues by utilising the Stronger Together portfolio of multimedia resources to communicate, to highlight, to inform, to advise and to support.

The focus has been on:

- the basic principles of the Modern Slavery Act 2015;
- how employers and employees can identify and prevent slavery and human trafficking;
- what we all can do to highlight slavery or human trafficking issues to the relevant parties within the organisation and beyond;