

# Anti-Slavery Policy



## Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## Policy Statement

The Symphony Group plc (the "Company") has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.

The Company is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the Company will aim to include specific prohibitions against the use of forced, compulsory or trafficked labour (or anyone held in slavery or servitude, whether adults or children) and expects that its suppliers will hold their own suppliers to the same high standards.

The purpose of this policy is to (a) set out the Company's responsibilities, and of those working for and on its behalf, in observing and upholding the Company's position on modern slavery and human trafficking; and (b) provide information to those working for us or on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

This policy applies to all persons working for the Company or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (and reference to an 'employee' in this policy shall be interpreted to include all such persons).

**This policy does not form part of any employee's contract of employment and the Company may amend it at any time.**

## Responsibility for the Policy

The Company's board of directors (the Board) has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that all those under its control comply with it. The Board has delegated day-to-day responsibility for implementing this policy, ensuring its maintenance and review and dealing with any queries about it to the HR Department. All employees are responsible for the success of this policy and must ensure that they familiarise themselves with it and act in accordance with its aims and objectives.

A handwritten signature in black ink, appearing to read "J. Dunsford".

John Dunsford  
Director

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## Compliance with the Policy

All employees, workers and subcontractors must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for it or under its control. Employees, workers and subcontractors are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Individuals are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business, its supply chain or the supply chain of any of its suppliers at the earliest possible opportunity. If an individual believes or suspects a breach of this policy has occurred, or that it may occur, they must notify their line manager or the HR Department or report it in accordance with the Company's Whistleblowing Policy as soon as possible.

If an individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager, the HR Department or the Company Secretary.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company's business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform the HR Department immediately. If the matter is not remedied, and they are an employee, they should raise it formally using the Company's Disciplinary & Grievance Policy.

## Communication and Awareness of this Policy

Training on this policy, and on the risk the Company's business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for the Company and regular training will be provided, as necessary.

The Company will seek to communicate its zero-tolerance approach to modern slavery to all suppliers, contractors and business partners.

## Breaches of this Policy

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

**The Company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.**

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John Dunsford  
Director