

## Modern Slavery and Human Trafficking Policy

Name:	Modern Slavery and Human Trafficking Policy
Date:	19 January 2025
Author:	Alasdair Hendry
Owner:	Alasdair Hendry
Version Number:	1.7

### Revision History

Version No	Author	Date Effective	Purpose of Issue and Description of Amendments
1.0	Michael Buchan	30/05/2018	First Draft
1.1	Michael Buchan	3/5/19	Annual review – no changes
1.2	Michael Buchan	15/5/20	Annual Review – no changes
1.3	Michael Buchan	18/1/21	Annual Review – no changes
1.4	Michael Buchan	11/4/22	Update to worker representation
1.5	Michael Buchan	18/4/23	Annual Review – no changes
1.6	Dawn Pryde	01/02/2024	Fair Labour moved to Diversity and Inclusion Policy, focusing this policy on activities related to Modern Slavery Act 2015. Removal of Scottish Business Pledge
1.7	Alasdair Hendry	19/01/25	Annual Review – no changes

### Approval & Distribution

	Name	Title	Version Approved
Authorised By	Alasdair Hendry	MD	1.7
Distributed to Whole Company via SharePoint on 19/01/2025			

## Policy Statement

At Exception we are committed to the principles of the Modern Slavery Act 2015 and the abolition of slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our employees. We want all employees to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not accept slavery or human trafficking in our business, and we will not work with others who do not share our commitment to preventing slavery and human trafficking.

We have reviewed and will continue to review our supplier list and conduct risk assessments of our supply chains. This supports our commitment as far as is possible, to ensure that slavery and human trafficking is not occurring in any part of our supply chain. Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chain.

This policy applies to all person working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third party representatives and business partners.

## Policy in Practice.

All employees are expected to be aware of and comply with this policy and are responsible for meeting these commitments and for raising any concerns or ideas for improvement.

Managers are responsible for applying the policy and ensuring that any issues are dealt with swiftly.

We are committed to providing a great place to work where no employee, customer, contractor and/or visitor suffer any discrimination, nor are they disadvantaged due to age, colour, disability, ethnic or national origin, marital status, nationality, race, religion, sex, sexual orientation, or other considerations not justified in law which are irrelevant to the performance of the job.

We are committed to providing our employees and Contractors with a salary that meets at least National Living Wage. We also offer extensive benefits that exceed the statutory minimum. All our employees are paid by bank transfer, and we do not allow payment into a third-party bank account.

As a responsible employer, we take the welfare of our employees seriously. Our Whistleblowing Policy encourages employees to report wrongdoing (including exploitation) in any form.

## Worker Representation

All workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. We adopt an open attitude towards the activities of trade unions and their organisational activities and workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

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## Human Trafficking & Modern Slavery Statement

At Exception we conduct our business with integrity, transparency, and fairness. We are committed to the prevention of slavery and human trafficking both in our business and in our supply chains. We procure goods and services in a sustainable and ethical manner in compliance with our values and relevant law and policy, including the Modern Slavery Act 2015.

### Training

All employees are required to certify that they have read and understood this Policy.

### Key Performance Indicators

We use the following Key Performance Indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:


- All employees have confirmed that they have read and understood this Policy
- Any policy breaches are reported within a reasonable time of occurring
- Any policy breaches are assessed within a reasonable time of being reported and further investigations concluded as soon as possible thereafter

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any instances of slavery and human trafficking. We understand that an Anti-slavery Policy is not sufficient to prevent slavery and human trafficking. It is important to develop a culture within the organisation which does not tolerate slavery or human trafficking and is not complacent about the associated risks. Through our good business practices and HR policies, we believe that we have established such a culture. Exception is committed to positively fostering this culture across the company through training, education and awareness initiatives.

### Supporting Documents

Document Title
Code of Ethics Policy
Diversity & Inclusion Policy
Whistleblowing Policy

### Signed

Name	Alasdair Hendry
Signature	
Position	Managing Director
Date	19 <sup>th</sup> January 2025

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