

CONTENTS	Page
1. OBJECTIVE.....	1
2. SCOPE .....	1
3. PRINCIPLES.....	1
4. DEFINITIONS .....	2
5. COMMITMENTS.....	2
6. REMEDIATION PROCESS (EMPLOYEES & SUPPLIERS) .....	2

### 1. OBJECTIVE

---

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.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our Commitment is set out in our Modern Slavery and Human Trafficking Statement

### 2. SCOPE

---

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, managers, officers, agency workers, apprentices, contractors, external consultants, and business partners and clients.

### 3. PRINCIPLES

---

The Senior Leadership Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The People Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. We aim 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.

#### **4. DEFINITIONS**

---

Modern Slavery - The recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Human Trafficking - The arrangement or facilitation of the travel of another person with a view to that person being exploited.

Forced Labour - Any work or service which people are forced to do against their will, under threat of punishment.

Servitude - The obligation to provide services imposed by coercion.

Supply Chain - All suppliers, contractors, and service providers who contribute to the company's operations, products, or services.

#### **5. COMMITMENTS**

---

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

We are 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. We keep the communication channels open, any concerns regarding treatment in relation to modern slavery will be managed through the company under Grievance or Whistleblowing policies. Any concerns should be report to HR or through our whistleblowing helpline or email address.

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

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **6. REMEDIATION PROCESS (EMPLOYEES & SUPPLIERS)**

---

## Anti-Slavery and Human Trafficking Policy

---

If modern slavery and/or human rights abuses are uncovered within our or our suppliers operations. This process is intended to end situations of forced labour and labour human trafficking, and as far as possible correct the harms experienced by victims. The process outlines who is responsible for remediation and when.

Lodge Service will work collaboratively with all relevant parties, including law enforcement authorities to investigate and address any instances and ensure that affected workers are not further harmed during the process. The safety and welfare of the victim is of primary importance throughout the whole process.

Lodge Service will:

- be flexible and responsive to the needs and wishes of the victim
- respond to a local understanding of the factors driving forced labour
- understand the risks and sensitivities present in the local context
- build on the strengths and capacities of partner organisations and national authorities
- be delivered in accordance with applicable national law and international labour and human rights standards
- incorporate means of preventing further abuses

This policy will be reviewed annual with the next review date set for December 2025