

## Anti-Slavery and Human Trafficking Policy

### POLICY STATEMENT

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.

Dual Seal Glass 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.

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. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes.

This policy applies to all persons working for us or on our 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.

### Responsibility For The Policy

The board of directors 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 Operations 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 issues of modern slavery.

### Due Diligence Processes

- We have made our staff aware of the Modern Slavery Act, including its definitions of slavery and human trafficking.
- We have told our staff what to do if they suspect a case of slavery or human trafficking.
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behavior.
- With regards to national or international supply chains, our point of contact is preferably with a UK based company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes



# Health & Safety Manual

May 2020

## Requirements for Suppliers:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable laws concerning the maximum hours of daily labour;
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and
- Will ensure that and sub-contractors or suppliers from whom they source their goods and/or services for incorporation in those supplied to Dual Seal Glass, also adhere to these requirements

## Reporting

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

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting a company director.

## Consequences

Dual Seal Glass takes any breach of this Policy extremely seriously. Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with Dual Seal Glass terminated immediately, without compensation.

If a Supplier to Dual Seal Glass is found in violation of this policy, Dual Seal Glass will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

Signed:

*ND Menzies*

Date:

*04/05/20*

Position: Managing Director