

ANTI-SLAVERY POLICY

1 ABOUT THIS POLICY

1.1 We conduct all our business in an honest and ethical manner and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. This includes 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.

1.2 This policy sets out our responsibilities, and those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking. It also provides information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

1.3 This policy applies to all persons working for us or on our behalf, in any capacity, including (but not limited to) employees at all levels, directors, consultants, casual and agency staff.

1.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

2 ANTI-SLAVERY PRINCIPLES

2.1 Modern slavery is a term used to describe the crimes of holding a person in a position of slavery, servitude, forced or compulsory labour, or human trafficking (facilitating a person's travel with the intention of exploiting them soon after). These crimes exist across the world, including the UK. They can occur in any business sector.

2.2 We will take action to identify, prevent and mitigate modern slavery in our operations and supply chains. This means that we will not support or deal with any business knowingly involved in modern slavery or human trafficking.

2.3 As part of our efforts to monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chains, we have implemented the following due diligence processes:

- conducting risk assessments to determine which parts of our business and which of our suppliers are most at risk from modern slavery and human trafficking;
- engaging with our suppliers to convey to them our anti-slavery policy and to understand what measures they have taken to ensure modern slavery is not occurring in their businesses;
- where possible, we build long-standing relationships with local suppliers and make clear our expectations of business behaviour.

2.4 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

2.5 Our commitment to addressing the issue of 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 on an ongoing basis.

3 YOUR RESPONSIBILITIES

3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are expected to follow this policy at all times and avoid any activity that might lead to, or suggest, a breach of this policy.

3.2 You are expected to report any cases where you know, or have reason to believe, that modern slavery has occurred. You should report cases to your manager in the first instance.

3.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager in the first instance.

4 QUESTIONS ABOUT THIS POLICY

4.1 If you have any questions about this policy, please contact Jon W whose email address is jon@zeerhomes.com.