
MODERN SLAVERY POLICY

The SML Group Ltd. recognizes that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the "Act"). The SML Group Ltd. takes a zero-tolerance approach to non-compliance with this Policy and will not tolerate any slavery or human trafficking in any part of its business or in any part of its supply chain. This Policy applies to all SML Group Ltd. subsidiaries worldwide, their officers, directors and employees, whether permanent or temporary. It also applies to SML Group Ltd.'s supply chain, which must ensure that both its business and that of its supply chain worldwide comply with this Policy.

SML Group Ltd. will take steps to ensure that modern slavery and human trafficking are not taking place in its own business or within any of its supply chain.

This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy. Its Strategic and Preferred supplier base must be accredited to an Achilles third party scheme. Modern Slavery compliance is covered in this. All other Suppliers must have submitted a Pre-qualification document, which also covers the Act.
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006.
- SML Group Ltd. will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- SML Group Ltd. will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

Every SML Group Ltd. employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to the SML Group Management.

SML Group Ltd. considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, SML Group Ltd. will notify the relevant authorities of an individual or a suppliers' contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.

Date: 01/08/2020



Thomas Harpin
Managing Director