

## MODERN-DAY SLAVERY POLICY

Monitor Group are thoroughly committed to ensuring that Modern Day Slavery is not associated with any of our activities. Modern Day Slavery includes slavery, human trafficking, forced labour and servitude. The company has zero tolerance to any form of modern slavery. We are always committed to acting with integrity and working ethically in all business dealings to putting effective controls and systems in place to safeguard against any form of modern-day slavery taking place within the business.

At Monitor Group, we are aware of our responsibilities towards employees and associates to the company and we also expect our suppliers to comply with the same ethical principles as we do. Our internal policies reflect our promise to acting ethically and with integrity in all our business relationships. A rising number of suppliers are now implementing the Labour Standards Assurance System (LSAS) which applies for tenders within the high-risk sectors and product categories, this system has indeed been referenced in the Modern Slavery Act 2015.

### How we conduct business in an ethical and transparent manner:

1. **Anti- bribery policy** – we operate an Anti-bribery Policy so that all employees at Monitor Group know they can raise concerns about how colleagues or customers receiving our services are being treated, or they can raise concerns about practices within our business.
2. **Equal opportunities** – we have a wide range of authority to protect our staff from poor treatment and or exploitation in which all comply with respective laws and regulations. This includes training, fair pay rates, development activities, fair terms and conditions of employment.
3. **Code of conduct** – this is an overall expectation of how we expect our employees and suppliers to act.
4. **Recruitment** – we have a robust recruitment procedure in place which includes conducting the eligibility to work within the UK. We provide training to those staff members who are involved in managing recruitment. All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave the Company's employment. Employees are free to serve notice at any time.
5. **Training** - all staff are expected to comply with all laws and act in accordance with local guidelines and regulations. We ensure our colleagues have access to any additional information and support they may require about human trafficking, forced labor, servitude and slavery. A training module on modern slavery and human trafficking is also available to all employees. The company ensures that all new joiners to the company are briefed on the Modern Slavery Act 2015 as part of their induction.
6. **Human Rights** – we are committed to upholding the values laid out in the European Convention on Human Rights (ECHR) and the Universal Declaration of Human Rights (UDHR)
7. **Freedom of Association** – In accordance with Article 11 ECHR and Article 20 of UDHR, Monitor Group upholds and encourages the freedom of anyone to belong to any legal association or be involved in any peaceful assembly. We will not discriminate against an individual because of their choice to belong to or not belong to any association.
8. **National Minimum Wage** – We uphold our legal obligation to comply with domestic national minimum wage legislation and use the services of an outsourced HR and employment law consultancy in order to support our internal compliance. Where our supply chain involves other territories, we endeavor to ensure that those supply chains where relevant comply with their own national minimum wage requirements.
9. **Child and Forced Labour** – Monitor Group does not and will not support the use of child labour or forced labour within our workplaces or within our supply chains and our client's businesses.
10. **Working Time Directive** – In accordance with the Working Time Regulations 1998, we ensure that no employee is forced to work more than 48 hours per week and may only do so with the express consent or will and agreement of the employee. We are also committed to ensuring that all employees and managers are aware of their rest break entitlements as laid out by the regulations.

Approved by –

A Henry -Managing Director

Date Approved – 13<sup>th</sup> October 2023

**Next Review due October 2024**