Anti-Slavery Policy

1. Purpose.

As a Company, Excalon maintains relationships with a variety of organisations in its supply chain in addition to employing over 240 employees and 80-100 sub-contractors.

Following the introduction of the Modern Slavery Act 2015, we have committed to continuous review of our risk management procedures to establish what measures may be introduced to prevent slavery and human trafficking taking place in any part of our business or in our supply chain.

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in a variety of forms including forced labour, servitude and human trafficking, all of which have a common theme of deprivation of an individual's liberty by another person or group of people to exploit them for personal or commercial gain.

This document sets out our policy with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. We will only trade with those who comply fully with this policy.

2. Reference documents

- Equalities Act 2010
- Excalon Equal opportunities Policy (HR001-EqualOpps)
- Excalon Recruitment and selection Policy (HR002-Recruitment)

3. Policy

Excalon is committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude from all our employees, sub-contractors, partners and of all parties with whom we have any kind of business dealings.

As a Company, we have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.

We expect all employees, sub-contractors and any other organisation or person who has, or seeks, a business relationship with Excalon, to familiarise themselves with our anti-slavery policy and to act always in a way which is consistent with this policy.

Commitments and expectations:

- We are committed to our disclosure obligations under the Modern Slavery Act 2015 and to ensuring that there is transparency within our own business and in our approach to tackling modern slavery throughout our supply chains.
- We expect the same high standards from all our contractors, sub-contractors, suppliers and all other business partners and we expect our suppliers to hold their own suppliers and partners to the same high standards.

- We are committed to evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
- We expect all our employees to familiarise themselves with our policy and procedures to help in the identification and prevention of modern slavery and to conduct business in a manner that ensure the opportunity for and incidence of modern slavery is prevented.
- All employees are expected to adhere to this policy which forms part of all employees' obligations under their contract of employment.
- We are committed to ensuring that modern slavery and human trafficking is not taking place in our supply chains but acknowledges that we cannot control the conduct of individuals and organisations in that supply chain.

We will therefore:

- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and acceptance of our right to audit their activities and relationships at times of reasonable suspicion and on a routine basis.
- Make our suppliers aware of their responsibility to adhere to our anti-slavery policy to ensure that modern slavery is not occurring in their business activities.

In instances where non-compliance is discovered, we are committed to taking appropriate action.

Reporting modern slavery or human trafficking - Whistleblowing Procedure

Any concerns in relation to suspected modern slavery associated with the Company or our suppliers may be reported by an employee through the Company's 'whistleblowing' procedure.

The nature of the complaint will then determine the Company's next course of action.

Any other person wishing to raise a concern should contact Excalon's Head of People and Development.

You should formally raise a concern if:

- You suspect a person acting on behalf of Excalon is seeking to exploit another in a way which could amount to modern slavery
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery.
- You have received an approach from a person acting on behalf of Excalon who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed
- You have information which leads to the rational conclusion that a person acting on behalf of Excalon or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Any reports of this nature will be kept confidential subject to the need for Excalon to act responsibly and within the law, i.e. that our maintaining confidentiality of the source of the information is not permitted by law or indeed is not consistent with our procedures to prevent modern slavery being committed on our behalf or within our supply chain.

Safeguarding

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.

We are committed to ensuring no one suffers any detrimental treatment because of reporting their suspicions of modern slavery in good faith.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will take seriously any concerns raised anonymously.

Anonymity does make investigations more difficult, so individuals are encouraged to put their names to any allegations if possible but will still fully respect the request for anonymity.

Any claims or allegations made which are found to be malicious will result in disciplinary action being taken against the individual through the Excalon Disciplinary process.

4. Records Management

All employees must maintain all records relevant to administering this process and procedure in line with Legislative and the company record keeping system.

5. Policy Review

The Company will monitor its policies, processes and procedures to implement changes to improve them and ensure that they comply with best practice, legislation changes and the emerging marketplace.

Version History: HR013 Anti-Slavery Policy			
Document Version	**Version Date**	**Revision Description**	**Author**
0.1	22/01/2016	Initial	Katrina Beck
0.1	19/07/2017	No Change	Laura Henshaw
0.2	01/08/2018	Minor amends & formatting	Katrina Beck
0.2	30/06/2021	No Change	Katrina Beck
0.2	08/08/2022	No Change	Alison Scragg
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DISTIRUBITON LIST		
Name	**Role**	**Location**
Company Wide & Contractors, sub-contractors, suppliers, partners	Company Wide & Contractors, sub-contractors, suppliers, partners, supply chain	All Offices

Signed on behalf of Excalon Ltd: _____ Kevin O'Donnell | Managing Director