

#### Introduction

This policy applies to Van Elle Holdings plc and all trading subsidiary companies.

Van Elle recognises that slavery and human trafficking are significant human rights issues and adopts a zero-tolerance approach. We are committed to taking appropriate steps to mitigate the risk of these occurring within our businesses and our external supply chain.

We operate an integrated management system that is certified to ISO 9001, ISO 14001 and ISO 45001. The management system includes our process for supplier approval and through this process, so far as is reasonably practicable, ensure that our supply chain is free from slavery and human trafficking.

# **Employees**

- We verify that all employees have the right to work in the UK upon commencement of their employment.
- Company policies and procedures are communicated to all employees during their induction programme. Updates and amendments to policies are communicated to all employees.
- All employees are provided with written confirmation of their terms and conditions of employment, including working hours, leave and absence entitlements, and other employment benefits.
- Training is available for all employees within our organisation, to ensure they are able to identify the signs of slavery and human trafficking and the associated risks.
- Our whistleblowing policy allows any employee to confidentially raise a concern.

### **Supply Chain**

- We maintain, and update periodically, a supplier approval system that includes a specific request for objective evidence of compliance with the Modern Slavery Act.
- The majority of our site materials are procured from UK-based organisations that are required to comply with UK laws on forced labour.
- We require all approved suppliers of agency workers to ensure their employees have the right to work in the UK.
- We commit to cease trading with and supplier that has been identified to us as being involved or connected to slavery or human trafficking.
- Our whistleblowing policy allows any third party to confidentially raise a concern.

## **Declaration**

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015.

#### **Board approval**

This statement was approved by the Board on 12 March 2024 and signed on its behalf by:

Mark Cutler - Chief Executive Officer

Mark Cuther

Date 12.03.2024

Review Date 12.03.2025

