


Document Title	Group Anti-Slavery and Anti-Trafficking Policy	
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Prepared by	Group Legal	
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GROUP ANTI-SLAVERY AND ANTI-TRAFFICKING POLICY

1. PURPOSE

The Lucy group entities (collectively “Group” and individually “Group Company”) are committed to the highest standards of ethical conduct and integrity in their business activities in the UK and overseas. This policy outlines the Group’s position to ensure there is no slavery or trafficking in any part of its business or supply chain. The Group will not tolerate any form of slavery by, or of, its Workers (as defined below) or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate slavery.

2. SCOPE

- 2.1. This policy applies to all individuals in the Group working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, apprentices, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, or our agents or any other person working with us (“Workers”), or representatives, sponsors, or any other person associated with the Group, or any of our subsidiaries or their employees (“Associated Persons”), wherever located.
- 2.2. Every Worker and Associated Person acting for, or on behalf of, the Group is responsible for maintaining the highest standard of conduct in all business activities.
- 2.3. This policy does not form part of any Worker's contract with the relevant Group Company and it may be amended at any time. Any breach of this policy by a Worker will be taken seriously and may result in disciplinary action. Any breach of this policy by an Associated Person may result in their contract being terminated.

3. POLICY

- 3.1. **Modern Slavery Act 2015:** The Group is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 3.2. **Records:** The Group will ensure all current suppliers are aware of this policy, and key suppliers will be asked on a regular basis, and other suppliers may be asked, to complete a questionnaire to inform the Group of their efforts to ensure there is no modern slavery in their business or supply chain. Any concerns raised will be dealt with sensitively and we will seek to support and provide advice as appropriate with the aim to influence and promote the highest standards of conduct.
- 3.3. **Due Diligence:** Appropriate due diligence on a risk-assessed basis should be undertaken by Workers and Associated Persons prior to entering into any contract, arrangement or relationship with any new supplier of services, agent, consultant or representative in accordance with the Group’s procurement procedures.

4. HOW TO RAISE A CONCERN

- 4.1. The prevention, detection and reporting of slavery and trafficking in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.2. You are encouraged to raise concerns about any issue or suspicion of slavery or trafficking in any part of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.3. If you believe or suspect a conflict or, breach of, this policy has occurred or that it may occur you must notify your line manager in first instance, or if this is not appropriate then their line manager, or disclose through the Whistleblowing helpline as set out in the Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 4.4. 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 slavery or trafficking, raise it with your line manager, their line manager, Group Legal or, if appropriate, through the Whistleblowing channels.
- 4.5. 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 as a result of reporting in good faith their suspicion that slavery or trafficking of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfair treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the most appropriate individual within your line management. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.