



Modern Slavery & Human Trafficking Policy

Ekspan Limited takes its obligations under the Modern Slavery Act 2015 very seriously. We are committed to driving out any acts of slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, partners and vendors.

We acknowledge our responsibilities under the Modern Slavery Act 2015 (as amended from time to time) and will ensure transparency throughout Ekspan and with its suppliers of goods and services to Ekspan.

Modern slavery is a criminal offence under the Act. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the Policy of Ekspan with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This Policy's use of the term "modern slavery" has the meaning given in the Act.

Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. Ekspan will not support or deal with any business knowingly involved in slavery or human trafficking of any kind. Ekspan's Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (e.g., personnel, training, financial investment etc.) to ensure that slavery and human trafficking is not taking place within Ekspan and within its supply chain.

As part of the Company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by all suppliers.

This policy sets forth those practices and gives insight into the supply chain and business processes of the company.

Any concerns from any member of Ekspan's staff regarding a likely risk of, or actual, breach of our policy or the legislation must be raised to our Compliance Officer at the earliest opportunity.

Responsibility

Our QHSE & Compliance Manager will liaise with all departments that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required.

We will ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this Policy.

Due Diligence Processes for Slavery and Human Trafficking

Forming part of our initiative to identify and mitigate risk we have in place systems to identify and assess potential risk areas in our supply chain. In addition Ekspan's Whistleblowing Policy encourages all of its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain without any retaliation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Ekspan's Whistleblowing Policy is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Ekspan's Whistleblowing Policy. The nature of the complaint will determine Ekspan's next course of action.

We endeavour to carry-out our own recruitment activities and/or to only use reputable employment agencies to source labour and complete appropriate background checks. Personnel responsible for the recruitment activities in any of our business divisions are advised to adhere to this Policy by ensuring that strict verification of the potential employee's right to work is carried-out before any offer of employment is made.



Ekspan expects its subsidiaries, sub-contractors and supply chain vendors to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request demonstration of compliance with this Policy.

Supply Chain

Our supply chain is underpinned by a rigorous contractual process which means that every Sub-contracted Partner undertakes our Approved Suppliers Process.

All Sub-contractors have a distinct obligation to comply with our Anti-Slavery and Human Trafficking Policy.

Supplier Adherence to our Values And Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have audit rights built into our Partner and Associate Contracts.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, training will be provided to our staff. We also require our partners to provide training to their staff and suppliers and providers in their respective supply chain.

Awareness and Performance Indicators

As well as training employees, Ekspan will raise awareness of modern slavery issues by displaying this Policy on Notice boards and our company handbook. EKspan will strive to ensure that all of its employees will be as well-informed as possible regarding this Policy.

Our policy on modern slavery will be communicated to all suppliers, Sub-contractors, vendors and other business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (as may be amended from time to time) and constitutes our slavery and human trafficking statement for the financial year ending May 2024.

Signed:

Max Angerer
Director

Date: 01/12/2023