




Modern Slavery Policy

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Modern Slavery Policy



INTRODUCTION

2020 Safety Training (2020 STL) is committed to observing the provisions of the Modern Slavery Act 2015.

POLICY STATEMENT

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

At 2020 Safety Training Ltd we conduct our business fairly, ethically and with respect to fundamental human rights. We have a comprehensive Code of Conduct which details all the ways we uphold ethical standards.

As part of our Code of Conduct, we are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human trafficking, both in our business and in any of our supply chains. We will not tolerate it.

We will endeavour to uphold all laws relevant to modern slavery in all the jurisdictions in which we operate. However, we remain bound by UK laws, including the Modern Slavery Act 2015, in respect of our conduct both at home and abroad.

SCOPE

Alongside our Code of Conduct, this policy applies to all persons working for us or any group company or on our behalf in any capacity, including employees at all levels, directors and partners, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and associates, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

ABOUT THIS POLICY

The purpose of this policy is to:

- a) Set out our responsibilities, and of those working for us, in observing and upholding our position on modern slavery; and
- b) Provide information and guidance to those working for us on how to recognise and deal with modern slavery issues.

It is a criminal offence to engage in modern slavery. Individuals found guilty can be punished by imprisonment. We therefore take our legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and

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government and public bodies, including their advisors, representatives and officials, politicians and political parties.

WHO IS RESPONSIBLE FOR THE POLICY

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that we all comply with it.

The Operations Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Operations Manager

PREVENTING MODERN SLAVERY IN OUR BUSINESS

2020 STL has a zero-tolerance approach to modern slavery in our organisation and our supply chains.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.

Everyone working for us or on our behalf must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery in our contracts with third parties.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

IF YOU ARE AN EMPLOYEE OR ASSOCIATE

2020 STL provides every employee with a written contract of employment and every associate with an associate contract. We pay everyone in accordance with UK law. We comply with our legal obligations to ensure the health and safety of our employees and workers, including in relation to working hours, rest breaks and holidays.

IF YOU ARE ONE OF OUR SUPPLIERS

If you supply 2020 STL with goods or services, we expect that you comply with your legal obligations in relation to Modern Slavery and are committed to ensuring there is no slavery, forced labour or servitude, child labour or human trafficking taking place in your business, or any of your supply chains.

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If you breach this policy or are found to have slavery or human trafficking in your business, or knowingly in your supply chain, we may terminate the contract with you and, where appropriate, report the matter to the Police.

YOUR RESPONSIBILITIES

(staff, suppliers, customers and associates)

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery are the responsibility of all those working for us or on our behalf. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the Operations Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if you suspect that someone may be the victim of human trafficking.

HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage. You must notify the Managing Director or the Operations Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

An internal investigation will be conducted within a reasonable timeframe and appropriate actions taken, which may include reporting to the Police if appropriate.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. If you believe that you have suffered any such treatment, you should inform the Managing Director or the Operations Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

TRAINING AND COMMUNICATION

Our zero-tolerance approach to modern slavery should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter (via drafting of contracts).

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with associates and other individuals and organisations working on our behalf if they breach this policy.

FURTHER INFORMATION

For any questions regarding this policy, please contact the Operations Manager.

Review frequency: Annual

Senior Manager: Salvatore Sgarlata – Operations Manager