



## Anti-Slavery & Human Trafficking Policy

### Introduction

Beck & Pollitzer Limited (“the Company”) maintains relationships with many different organisations in its supply chain as well as employing directly large numbers of people. Following on from the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and the risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of the business or in its supply chains.

We expect all or who have, or seek to have, a business relationship with Beck & Pollitzer Limited and/or any member of our Group, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with its values. Zero tolerance is at the core of Beck & Pollitzer Limited’s Anti-Slavery Policy.

### 1. Purpose of this Policy

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (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 Beck & Pollitzer Limited 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.
- 1.2 The company has a zero-tolerance approach to modern slavery. It is 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 within our Company or those of its suppliers.

### 2. Steps for the prevention of modern slavery

- 2.1 The Company is committed to ensuring there is transparency in its own business and in our approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and the Company is evolving and updating our contracting processes to include specific prohibitions against the used force, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Company expects its suppliers to hold their own suppliers to the same high standards.
- 2.2 All employees have an obligation to familiarise themselves with the Companies procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees’ obligations under their contract of employment.
- 2.3 Whilst recognising the Company’s statutory obligation to set out the steps it should take to ensure that modern slavery and human trafficking is not taking place in its supply chains, the Company acknowledges that it does not control the conduct of individuals and organisations in its supply chains. To underpin its compliance with practical steps, the Company intends to implement the following measures:
  - I. Conduct risk assessments to determine which parts of the business and which of the Company’s suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
  - II. Engage with the Company’s suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
  - III. Where appropriate, as informed by the Company’s risk assessment, seek to introduce further supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
  - IV. Introduce contractual provisions for the Company’s suppliers to confirm their adherence to this policy and accept the Company’s right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
  - V. At the end of the financial year the Company will include in the director’s report accompanying its annual financial statements a reference to the Company’s Slavery and Human Trafficking Statement, which will be presented on the Company’s website during the course of 2017.

### 3. Responsibility for the Policy

- 3.1 Ultimate responsibility for the prevention and the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with its legal and ethical obligations.
- 3.2 Managers and Team Leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

### 4. Actions to report modern slavery or human trafficking

#### Whistleblowing procedure – direct access to senior leadership

The Company's Whistleblowing Policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or its suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the Human Resources policies section of the Companies Document Management System (DMS).

In summary, employees should approach either their Country or Regional Manager, CEO or the Group Head of Human Resources. The nature of the complaint will determine the Company's next course of action.

#### Suspicious activity confidential feedback email

The confidential email address – [hr@beck-pollitzer.com](mailto:hr@beck-pollitzer.com) - may be accessed by employees or any other person wishing to raise a concern. You should notify the Company in any of the following circumstances:

- You suspect a person acting on behalf of Beck & Pollitzer Limited or one of its businesses 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 Beck & Pollitzer Limited or one of its businesses who has invited you to participate in acts which could result in offence under the Modern Slavery Act 2015 being committed

Any reports to the email address above are kept in confidence, subject to the need for the Company to act responsibly and within the law. The source of reports to the email address will be kept confidential, save to the extent that maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with the Company maintaining adequate procedures for the prevention of modern slavery being committed on its behalf or in any element of its supply chain.

#### Direct communication

The Company encourages members of the public or people not employed by us to write, in confidence, to the Group Head of Human Resources to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

### 5. Breaches of this Policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 5.2 We will terminate our relationship with other individuals and organisations working on our behalf if they materially breach this policy.

#### Safeguards

The company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if the turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

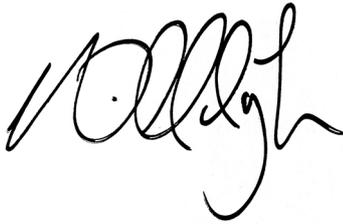
Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

**Communication and awareness of this Policy**

The company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the Company's business relationship with them and reinforced as appropriate thereafter. In addition, all senior leadership within the company receive awareness training and must fully comply with the policy wherever they are based globally.

**Review**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published no later than the publication of our 2016 financial results.



Andrew Hodgson  
Chief Executive Officer