

## 1 PURPOSE

Luce Bay Group strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

## 2 SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

## 3 MODERN SLAVERY AND HUMAN TRAFFICKING

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.

## 4 COMMITMENTS


We shall be a company that expects everyone working with us or on our behalf to support and uphold the following

- measures to safeguard against modern slavery:
- We have 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. Workers 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 suppliers to address the risk of modern slavery in our operations and supply chain.
- employment and recruitment agencies and other third parties supplying workers to our organisation may be required to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated to termination of the relationship.



Adam McIntosh  
Company Director  
01 December 2021



Alastair McIntosh  
Company Director  
01 December 2021