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Page No:	1 of 17	Date:	4-Jan-23



Table of Contents

QUALITY POLICY	2
ENVIRONMENTAL POLICY	3
HEALTH & SAFETY POLICY	4
ANTI BRIBERY AND CORRUPTION POLICY	5-8
DATA PROTECTION POLICY	9-10
WASTE HANDLING POLICY	11
DIVERSITY & EQUAL OPPORTUNITIES POLICY	12-13
CORPORATE & SOCIAL RESPONSIBILITY POLICY	14
MODERN SLAVERY AND HUMAN TRAFICING POLICY	15-16

NB. Additional policies not listed here can be found in our H&S Manual or employee handbook

The policies will be reviewed at least every 2 years or when changes to legislation or the business occur.

Page 1 of 17



Quality Policy and Objectives

It is the policy of The Frank Barnes Group to achieve sustained, profitable and stable growth by providing Services, which consistently satisfy the needs and expectations of its customers.

This is achieved through the:

- Full commitment of all management and workforce to this quality policy, allied to active involvement in quality improvements.
- Understanding of all employees of the long-term importance of achieving customer satisfaction by providing a consistently high quality of product or service and conformance with statutory and regulatory requirements
- Skill, dedication and relevant working experience of staff.

The objectives of the System are to:

- Maintain an effective management system complying with statutory, technical, National and International Standards such as ISO9001
- Achieve and maintain a level of service and performance that enhances the Company's reputation with customers.
- Encourage a culture of flexibility, service, quality and continuous improvement.
- Targets and measures are in place, which are reviewed and are compatible with this policy.

Managing Director

Reviewed: 4th January 2023



ENVIRONMENTAL POLICY STATEMENT

Frank Barnes Group Limited is a multi-site employer whose principle activities are scrap metal dealing, waste management and skip and plant hire.

The Board of Directors recognise that developing our business in an environmentally responsible manner, taking full account of evolving environmental issues, compliance with applicable legal requirements and commitment to the prevention of pollution, is in the best interests of the Company, its employees and the protection of the environment.

This policy has been developed and is signed on behalf of all Board members by the Director responsible for day to day operations at our Cross Street, Darwen location.

A copy of this policy will be communicated throughout the Company and will be posted permanently on the Frank Barnes (Darwen) website www.frank-barnes.co.uk

We endeavour to conduct our own business activities and operations in line with best environmental practice, seeking continual improvement and innovation within all of our sites activities.

Frank Barnes (Darwen) Limited site will seek to: -

- Minimise the use of all materials, supplies and energy and wherever possible use renewable or recyclable materials.
- Minimise the quantity of waste produced in all aspects of our business.
- Communicate our environmental policy to all staff and encourage them to participate in the achievement of our goals.
- Supply and promote, wherever possible, those products, which contribute to energy conservation and do not damage the environment.
- Ensure that the company continues to meet present and future environmental standards, legislation and licence requirements.
- Maintain an emergency plan on site to deal effectively with potential incidents
- Store and distribute all products in a manner that minimises environmental impact
- Targets and measures are in place, which are reviewed and are compatible with this policy
- Increase the environmental awareness of all employees.

Managing Director

Reviewed: 4th January 2023

© Frank Barnes Group File name: FBP 0.4 Policies v6 Uncontrolled When Printed date: January 4, 2023 Page 3 of 17



HEALTH & SAFETY POLICY STATEMENT

"It is the policy of Frank Barnes Darwen Ltd that all activities carried out on all our sites or undertaken by our personnel will be managed in such a manner so as to avoid, reduce, or control, all foreseeable risks to health & safety to any person so far as is reasonably practicable"

The <u>Health and Safety at Work etc Act 1974</u> and all other subordinate legislation; impose a statutory duty on employers to ensure so far as is reasonably practicable, the health and safety of their employees whilst at work. This duty also extends to others who may be affected by that work.

To enable these duties to be carried out, we will ensure so far as is reasonably practicable, that responsibilities for health and safety matters are effectively assigned, accepted and fulfilled at all levels within our organisation.

It is our policy to manage all activities, protect our employees, contractors and all lawful visitors to our premises ensuring that we are committed to:

- Providing adequate control of the risks arising from our work activities and where possible eliminate hazards or reduce occupational health and safety risks to the lowest practicable level
- Meeting all applicable legal and other applicable requirements/obligations
- Consulting with our employees on matters affecting their health and safety
- Provide the provision and maintenance of safe plant, equipment and systems of work;
- Arrangements for ensuring, safety and absence of risks to health and safety in the connection with handling, storage and transport and the use of substances;
- Provide information, instruction and supervision, and other relevant health and safety information to all employees;
- Ensure all employees are competent to do their tasks, and to give them adequate training
- Prevent accidents and cases of work-related ill health
- Maintain safe and healthy working conditions; and
- Review and revise this policy as necessary at regular intervals.

To assist in the continual improvement of the Health & Safety Policy, we will set objectives and targets to monitor the effectiveness of the Heath and Safety System. We will also seek advice from appropriate external sources, employees and our Health & Safety Advisor.

Managing Director

Reviewed: 4th January 2023

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Page 4 of 17



ANTI BRIBERY AND CORRUPTION POLICY

What this policy covers

It is the Company's policy to conduct all of our business in an honest and ethical manner. The Company will not tolerate any acts of bribery and corruption and is committed to acting professionally and ethically in all our business dealings and relationships, wherever we operate, and we are committed to implementing and enforcing effective systems to counter bribery.

The purpose of this policy is to ensure that employees are aware of their duties towards the Company to report and help to prevent any acts of bribery across the organisation.

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory, or personal advantage.

The Bribery Act 2010 contains two general offences covering the offering, promising or giving of a bribe ("active" bribery) and the requesting, agreeing to receive or accepting of a bribe ("passive" bribery). The Act also introduces a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation.

An individual who is found to have committed an offence of bribery can be imprisoned for a term of up to ten years, and the Company could face an unlimited fine for any bribery related offences committed by a person associated with us. The implications for the Company are very serious; for example, we could be excluded from tendering for public contracts and could suffer inevitable damage to our reputation. We therefore take our responsibilities in this regard very seriously.

As a result, all employees and workers are required to comply with the procedures which the Company has put in place to prevent persons associated with us from committing acts of bribery and corruption.

Your entitlements and responsibilities

The purpose of this policy is to set out the Company's responsibilities, and the responsibilities of those working for us, in observing and upholding our position on bribery and corruption; and to provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "workers" in this policy).

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File name: FBP 0.4 Policies v6

Uncontrolled When Printed date: January 4, 2023

Page 5 of 17



In this policy, any references to "third parties", 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 government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Gifts, Hospitality, Promotional, and other Business Expenditure

This policy should be read in conjunction with any Business Gifts Policy that may be in operation at any time. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. Hospitality and promotional, or other business expenditure which seeks to improve the image of the Company, or to establish cordial relations with our clients, suppliers and business partners, is recognised as an accepted and important part of doing business.

Subject to prior authorisation by a Director, the Company may allow reasonable and proportionate hospitality and promotional or other similar business expenditure intended for these purposes. However, offers or receipts of hospitality and other similar business expenditure can be employed as a form of bribery. It is therefore essential that any such corporate gifts and receipts of this nature are reported and duly authorised.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in the Company's name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, for example, it is often customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Director.

In all circumstances, the test to be applied is whether, the gift or hospitality is reasonable and justifiable.

2

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Page 6 of 17



It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Company in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation payments

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

If you are asked to make a payment on the Company's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with a Director.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Recording the receipt and giving of gifts

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

You must ensure that you read, understand and comply with this policy.

25

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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File name: FBP 0.4 Policies v6

Uncontrolled When Printed date: January 4, 2023

Page 7 of 17



Procedure

Reporting a concern

You must notify a Director 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 a third party, client or potential client offers you something to gain a business advantage with the Company, or indicates to you that a gift or payment is required to secure their business.

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

You are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with a Director. Concerns should be reported by following the procedure set out in the Company Whistleblowing Policy.

It is important that you notify a Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Confidential and safe reporting procedures

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy.

The Company is committed to ensuring that no one suffers any detrimental treatment as a result of raising any concerns under this policy. If you believe that you have suffered any such treatment, you should inform a Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

Training and implementation

Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Directors will have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

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Uncontrolled When Printed date: January 4, 2023 Page 8 of 17 File name: FBP 0.4 Policies v6



Signed:

Director on behalf of Frank Barnes Group

Reviewed: 4th January 2023

DATA PROTECTION POLICY

Overview

The Frank Barnes Group are committed to protecting the privacy of all the data (including personal data) we hold and use. We have written this policy to outline our commitment and procedures we have in place for the data we hold and control.

We need to keep certain information about customers and suppliers to allow us to conduct our business in a responsible and legal way. We also need to store some data on staff to allow us to make payments, monitor performance, achievements, and health and safety, for example.

We have a legitimate reason for any data we collect, hold or process e.g. processing information so that business can be conducted, staff can be recruited and paid and to ensure legal obligations to government complied with.

Protecting the privacy of the data we hold and use is a significant part of maintaining the trust we have built with businesses and people we deal with. We Recognize the rights of Individuals are fully committed to ensuring your data is protected and only used as intended.

We are committed to all the principles of data protection as outlined below and to complying to all aspects of the current legislation.

Principles

 processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency')

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Page 9 of 17



- 2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('legitimate purposes')
- 3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- 4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- 5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');
- 6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

Information Collection and Use

We are the sole owner of the information collected and will collect the information based on consent, legal, or contractual requirement. We do not sell, share, or rent this information to others for market research or commercial purposes, other than to deliver legitimate services e.g. facilitating payments for sales and wages.

Information Sharing

We use some third party companies e.g. card payment processing systems. We have contracts with these companies for these services and they do not retain, share, store or use personally identifiable information for any secondary purposes. We do not share or transfer any personal data outside the EU.

Our Responsibilities

The directors are responsible for ensuring all aspects of data protection outlined in this policy are implemented and followed by the business. The directors are also responsible for providing adequate resources and training to ensure compliance with this policy and all associated legislation.

The data protection officer (Company Secretary) reports to the directors and is responsible for maintaining and developing the system and associated procedures. They are also responsible for the audit of the system and for reporting any concerns/breaches to the directors.

The IT manager is responsible for the structure and security of the information system and the data it holds.

Staff Responsibilities

This policy and its supporting procedures apply to all staff (including any temporary staff and contractors) who have access to information systems or information used for business purposes.

All staff are responsible for compliance with the policy and procedures. Any reckless or deliberate breaches of this policy will be investigated and reported to a director who will consider whether disciplinary action should be taken against the member of staff concerned.

© Frank Barnes Group File name: FBP 0.4 Policies v6 Uncontrolled When Printed date: January 4, 2023

Page 10 of 17



Signed:

Director on behalf of Frank Barnes Group

Reviewed: 4th January 2023

Waste Handling Policy

The Frank Barnes Group aim to continually improve out waste management system and processes in order to:

- · Increase re-use and recycling
- Minimise landfill and
- Meet accepted environmental best practice.

Waste streams are sorted and segregated in each department and area to ensure that recyclable waste is separated from any non-recyclable waste. Non-recyclable waste is collected in a general skip in the yard area and transported to landfill when full.

<u>Offices Waste Procedure</u>: All paper and cardboard is collected in the recycling box in the office and emptied into the waste paper and cardboard skip located in the yard. Paper of a sensitive nature is shredded first before being emptied into the recycling skip. Empty printer cartridges are collected in the recycling box sited within the main office and collected once the box is full.

Yard Waste Procedure:

Metal waste is sorted and stored in the appropriate place:

Titanium swarf waste is stored separately in the designated area to prevent ignition.

Precious metals are segregated and stored in the Brass shop until sold. Other metal waste is stored in the appropriate, designated, area until it is sold on.

Large items of scrap metal are processed and may be baled to ease handling and storage.

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File name: FBP 0.4 Policies v6

Uncontrolled When Printed date: January 4, 2023

Page 11 of 17



General waste is sorted by manual and mechanical means at the waste station. Recyclable items are stored in the appropriate area until sold on; landfill is kept to an absolute minimum.

Wood is collected and loaded into an ejector trailer from where it is taken to be recycled into sawdust and shavings.

Hardcore waste: is crushed using the crusher and screening plant on site. It is graded and sold on for construction purposes. Dust is kept to a minimum by the use of water sprays and operations are subject to Local Authority restrictions.

Litter is kept to a minimum by covering filled skips when the weather is windy. The waste sorting area is enclosed on three sides by high walls to prevent paper etc. from blowing away. Employees are aware of the impact that litter can have on our surroundings and will take all necessary steps to prevent it.

We will communicate and promote our waste principles within the company to improve understanding and compliance, by implementing an in-house training programme.



Reviewed: 4th January 2023

DIVERSITY & EQUAL OPORTUNITIES POLICY

What this policy covers

The Company recognises the benefits of a diverse workforce and is committed to providing a working environment that is free from discrimination.

The Company will seek to promote the principles of equality and diversity in all its dealings with employees, workers, job applicants, clients, customers, suppliers, contractors, recruitment agencies and the public.

All employees and those who act on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any other guise.

Your entitlements and responsibilities

Unlawful discrimination

Unlawful discrimination of any kind in the working environment will not be tolerated and the Company will take all necessary action to prevent its occurrence.

Specifically, the Company aims to ensure that no employee or job applicant is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation or trade union membership. This commitment applies to all aspects of employment, including:

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Uncontrolled When Printed date: January 4, 2023 File name: FBP 0.4 Policies v6 Page 12 of 17



- recruitment and selection, including advertisements, job descriptions, interview and selection procedures
- training
- promotion and career-development opportunities
- terms and conditions of employment, and access to employment-related benefits and facilities
- grievance handling and the application of disciplinary procedures
- · selection for redundancy

Equal opportunities practice is developing constantly as social attitudes and legislation change. The Company will review all policies and implement necessary changes where these could improve equality of opportunity.

Recruitment of ex-offenders

The Company actively promotes equality of opportunity for all candidates, including those with criminal records where appropriate.

The Company requires you to provide details of any criminal record at an early stage in the application process. Any such information should be sent in a separate confidential letter to the designated person. Only those who need to see it as a formal part of the recruitment process will have access to this information.

Having a criminal record will not necessarily prevent you from being appointed.

Any recruitment decision will depend on the nature of the position and the circumstances and background of the offence(s). The Company will discuss with you the relevance of any offence to the job in question.

If you fail to reveal any information relating to disclosures in accordance with the Company's Disclosures Policy, this may lead to the withdrawal of an offer of employment.

Career development

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities, recruitment or promotion to all jobs will be based solely on merit.

All employees will have equal access to training and other career-development opportunities appropriate to their experience and abilities.

However, the Company will take appropriate positive action measures (as permitted by equal opportunities legislation) to provide specialist training and support for groups that are under-represented in the workforce and encourage them to take up training and career-development opportunities.

Procedure

Complaints of discrimination

The Company will treat seriously all complaints of discrimination made by employees, clients, customers, suppliers, contractors or other third parties and will take action where appropriate.

© Frank Barnes Group File name: FBP 0.4 Policies v6 Uncontrolled When Printed date: January 4, 2023
Page 13 of 17



If you believe that you have been discriminated against, you are encouraged to raise the matter as soon as possible with your manager or other senior employee using the Company's Grievance Procedure (outlined elsewhere in the Employee Handbook).

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, the Company is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's Disciplinary Procedures.

Investigating accusations of unlawful discrimination

If you are accused of unlawful discrimination, the Company will investigate the matter fully.

During the course of the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions.

If the investigation concludes that the claim is false or malicious, the complainant may be subject to disciplinary action.

If the investigation concludes that your actions amount to unlawful discrimination, you will be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.

Signed:

Director on behalf of Frank Barnes Group

Reviewed: 4th January 2023

CORPORATE & SOCIAL RESPONSIBILITY POLICY

The Frank Barnes Group recognise we have a responsibility to operate to a high standard and in a responsible way across all our business activities for the benefit of our customers, employees and other stakeholders.

This includes the delivery of our waste and other services to customers, whilst demonstrating social responsibility, environmental sustainability and delivering value for the local community and all our stakeholders.

The Directors are fully committed to the practice of the following principles:

- Compliance with all applicable laws, regulations and other employment standards.
- Respecting the rights and dignity of every employee and treating them fairly and without discrimination.
- Promoting a safe, healthy, inclusive and productive environment for all our people, contractors and visitors, whilst operating ethically.

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Uncontrolled When Printed date: January 4, 2023

File name: FBP 0.4 Policies v6

Page 14 of 17



- Engaging and motivating our people, providing the opportunity to learn and grow supported through structured training programmes and development opportunities.
- Reduce our environmental impacts through the use of good environmental policies, objectives and practices as part of our ISO 14001 management system.
- Build positive relationships and support networks with the communities where we live and operate and reducing any negative impacts from our operations.
- Understand and meet the needs and expectations of our customers providing them with a sustainable solution for their waste management.

The principles will be communicated and reviewed on a regular basis

Signed:

Director on behalf of Frank Barnes Group

Reviewed: 4th January 2023

Modern Slavery and Human Trafficking Policy

Policy Statement

We have a zero-tolerance approach to modern slavery and we are 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 in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any disclosure obligations under the 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.

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, interns, agents, contractors, external consultants, third-party representatives and business partners.

Responsibility for the Policy

© Frank Barnes Group File name: FBP 0.4 Policies v6 Uncontrolled When Printed date: January 4, 2023 Page 15 of 17



The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The management team have 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 in countering modern slavery.

The management team are also 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 in supply chains.

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

Compliance with the Policy

The prevention, detection and reporting of modern slavery 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.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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 modern slavery, raise it with your manager.

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 modern slavery 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 unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and Awareness of This Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

© Frank Barnes Group File name: FBP 0.4 Policies v6 Uncontrolled When Printed date: January 4, 2023 Page 16 of 17



Breaches to 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 other individuals and organisations working on our behalf if they breach this policy.

Signed:

Director on behalf of Frank Barnes Group

Reviewed: 4th January 2023