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1.0 Document Control

1.1 Revision History

Rev	Description	Title	IMS Version	Date	Author	Approval
2.0	Approved for use	DPS_IMS_POL0036	2	07/07/20	V Coates	C Burnett
1.0	Approved for use	DPS_IMS_POL0036	2	02/03/20	V Coates	C Burnett

1.2 Reference Documents

Title	Description

2.0 Policy

2.1 Introduction

This Policy sets out the Company’s zero-tolerance approach to modern slavery.

The Company is committed to acting ethically and with integrity in all its business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its UK business operations or in any of the Company’s supply chains.

Modern slavery is a crime and a violation of fundamental human rights. The Company recognises this takes various forms, such as slavery, servitude, forced and 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.

The Company is committed to ensuring there is transparency in its business and in its 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 suppliers, contractors and other third parties. As part the Company’s contracting processes, it expects that its suppliers will hold their own suppliers to the same standards set out in this policy.

The board of directors has overall responsibility for ensuring this policy complies with the Company’s legal and ethical obligations, and that all those staff and third parties under its control comply with it.

2.2 Who Does the Policy Apply To

This policy applies to all persons working for the DPS Group or on its behalf in any capacity, including employees at all levels, directors and Staff, third parties including agency workers, customers, suppliers, interns, agents, contractors, external consultants (“third parties”).

2.3 Scope of the Policy

This policy describes how the Company will prevent, detect and report modern slavery in any part of its business or supply chains.

The Company aims 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. 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 the business or in any Company’s supply chains.

- All staff and third parties must comply with this policy and are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- All staff and third parties are required to raise any concerns about any issue or suspicion of modern slavery in any parts of the Company’s business or supply chains of any supplier tier at the earliest possible stage.
- If any staff believe or suspect a breach of this policy has occurred or that it may occur the individual must notify either their manager or the UK Legal Department or report it in accordance with the procedure set out in the Company’s Ethics and Equality Policies as soon as possible.
- Third parties should notify a senior Company point of contact.
- If staff or third parties are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company’s supply chains constitutes any of the various forms of modern slavery, they should contact the DPS Group senior management team.
- All managers are responsible for ensuring that this policy and the Company’s zero-tolerance approach to modern slavery is communicated to all employees and for ensuring those individuals reporting to them understand and comply with this policy and are given adequate and regular training as applicable on the policy and the issue of modern slavery in supply chains.
- Management have 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.
- All managers who are responsible for procurement of goods and / or services must ensure that this policy and the Company’s zero-tolerance approach to modern slavery is communicated to all third parties during the procurement process and / or at the outset of each business relationship.
- Managers are responsible for ensuring that all relevant existing third party contracts include obligations to comply with the Modern Slavery Act and new third party contracts contain applicable prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- The Company may terminate its relationship with other third parties if they breach 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 and trafficked labour in our contracts with third parties.
- Consistent with our risk based approach we may require:
- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policy
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policy.