



WESTMINSTER
GROUP PLC

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

CREATED: NOV 2016

REVISION: JAN 2022

APPROVED BY THE BOARD: JAN 2022

This policy relates to the Westminster Group Plc and all subsidiaries:

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY SCOPE

This policy applies to all persons employed by the company, its subsidiaries, associate companies and those acting in any capacity on behalf or for the company including agents, suppliers, service providers and other business partners.

The Westminster Group Plc (Westminster) is committed to meeting the objectives of the Section 54(1), Part 6 of the UK Modern Slavery Act 2015 and preventing the use of modern slavery and human trafficking in its operations, supply chains and products. Westminster have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within its organisation and operations. Westminster expects that its agents, suppliers, service providers and other business partners ensure that they and their companies enforce the same high standards

DEFINITION OF 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

WESTMINSTER COMMITMENT

Westminster expects all persons employed by the company, its subsidiaries, associate companies and anyone acting in any capacity on behalf of or for the company including its agents, suppliers, service providers and other business partners support and uphold the following measures to safeguard against modern slavery: -

- Enforce a zero-tolerance approach to modern slavery in our and their organisations.
- The prevention, detection and reporting of modern slavery occurrences within our and their organisations.
- Ensure employees do not commit, engage in, facilitate or fail to report any activity that might lead to or suggest a breach of this policy.
- Commit to ensure that there no risk of modern slavery in our operations and supply chain.
- To assess whether the circumstances warrant inclusion of specific prohibitions against the use of modern slavery and trafficked labour in service provider contracts.
- Require employment and recruitment agencies and service providers to confirm their compliance with this policy
- Service providers engaging workers through a third party must obtain the third parties agreed compliance with this policy.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

As part of Westminster's ongoing risk assessments and due diligence we will regularly review the necessity of carrying out audits of service providers to confirm their continuing compliance with this policy.

AWARENESS OF THIS POLICY

EMPLOYEE

Training on this policy, and on the risk the company business faces from modern slavery and human trafficking in its supply chains, forms part of the induction process for employees. Regular update training is provided as necessary. It is the responsibility of all employees to ensure they are fully aware of this policy.

SERVICE PROVIDERS

Westminster's zero-tolerance approach to modern slavery is communicated to agents and service providers partners at the outset of a business relationship being entered into this is regularly reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

If it is found that individuals or organisations working for or on our behalf have breached this policy appropriate action will be taken.

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

Westminster may terminate its relationship with its agents, service providers and other business partners if it is found that they have breached this policy.

RESPONSIBILITY

The Westminster Group Plc board of directors has overall responsibility for ensuring this policy complies with the relevant legal and ethical obligations and that all employees, agents and business partners are in compliance with it.

The compliance 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 in countering modern slavery.

SUPPORTING POLICIES

The following policies should also be referenced in support of this policy:

- 10. CSR (Corporate Social Responsibility) Policy
- 14. Whistle-blower Policy
- 17. Code of Ethics
- 39. Recruitment Policy

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Peter Fowler

Chief Executive Officer

Westminster Group Plc