Human Slavery & Trafficking Policy

Ekspan Limited takes its obligations under the Modern Slavery Act 2015 very seriously. We are committed to driving out any acts of slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, partners and vendors. We acknowledge our responsibilities under the Modern Slavery Act 2015 (as amended from time to time) and will ensure transparency throughout Ekspan and with its suppliers of goods and services to Ekspan.

This policy applies to:

All employees of Ekspan Limited
Contractors, consultants, agency workers and temporary staff
All suppliers, contractors and service providers acting on behalf of Ekspan Limited

Modern slavery is a criminal offence under 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 to exploit them for personal or commercial gain. This document sets out the Policy of Ekspan 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.

Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. Ekspan will not support or deal with any business knowingly involved in slavery or human trafficking of any kind. Ekspan's Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (e.g., personnel, training, financial investment etc.) to ensure that slavery and human trafficking is not taking place within Ekspan and within its supply chain.

As part of the Company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by all suppliers.

This policy sets forth those practices and gives insight into the supply chain and business processes of the company.

Any concerns from any member of Ekspan's staff regarding a likely risk of, or actual, breach of our policy or the legislation must be raised to our Compliance Officer at the earliest opportunity.

Responsibility
Our QHSE & Compliance Manager will liaise with all departments that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required. We will ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this Policy.

Due Diligence Processes for Slavery and Human Trafficking
Forming part of our initiative to identify and mitigate risk we have in place systems to identify and assess potential risk areas in our supply chain. In addition, Ekspan's Whistleblowing Policy encourages all of its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain without any retaliation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Reporting Concerns
Ekspan's Whistleblowing Policy is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Ekspan's Whistleblowing Policy. The nature of the complaint will determine Ekspan's next course of action.

We intend to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and complete appropriate background checks. Personnel responsible for the recruitment activities in any of our business divisions are advised to adhere to this Policy by ensuring that strict verification of the potential employee's right to work is carried out before any offer of employment is made.

Review and Continuous Improvement
This policy will be reviewed annually or sooner if required by legislative or organisation changes.

Publication
This Modern Slavery & Human Trafficking Policy is publicly available on our website. www.ekspan.com