

Modern Slavery Policy

Date	December 2018
Review	This policy will be reviewed periodically.

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This policy applies to all Board members, employees and casual workers henceforth referred to as the Staff of Sadeh.

1. INTRODUCTION AND POLICY STATEMENT

1.1 Sadeh has a zero-tolerance policy towards modern slavery, whose forms are crimes and violations of fundamental human rights. Sadeh is committed to acting ethically and with integrity in all business dealings and relationships. We have in place effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chains.

1.2 Modern slavery takes various forms, including:

1.2.1 slavery

1.2.2 servitude

1.2.3 forced and compulsory labour

1.2.4 human trafficking.

The above forms of slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.3 Sadeh is committed to ensuring there is a transparency in our own organisation and in our approach to preventing modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and our own principles for sustainable business.

2. APPLICATION

2.1 This policy applies to all Staff working for or on behalf of Sadeh in any capacity, including all employees, consultants, agency workers, individuals undertaking work experience, contractors, third-party representatives and business partners.

The supply chain

2.2 Sadeh expects all of its contractors, suppliers and other business partners to adopt the same high standards in the pursuit to prevent modern slavery. As part of our procurement and contracting processes, Sadeh expects Suppliers to ensure compliance with the Act and our own policy against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

2.3 Sadeh expects our suppliers to adopt the same principles when contracting their own suppliers.

Employee Terms and Conditions

2.4 Sadeh ensures compliance with all applicable employment legislation relating to recruitment and employee terms and conditions, including ensuring that right to work checks are properly carried out, and that no staff in the UK are paid less than the National Minimum Wage.

3. RESPONSIBILITY FOR THE POLICY

- 3.1 The Board has overall responsibility for ensuring this policy complies with the Sadeh's legal and ethical obligations and that all Staff comply with the policy.
- 3.2 The Chief Executive Officer has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

4. COMPLIANCE WITH THE POLICY

- 4.1 All Staff are required to read, understand and comply with this Policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of Sadeh's business or supply chain is the responsibility of all Staff. All members of Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 In the event of an actual, suspected or potential breach of this Policy, within the organisation itself or its supply chain, you should contact your relevant Line Manager
- 4.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Sadeh's supply chains constitutes any forms of modern slavery, you should seek guidance from your Line Manager.
- 4.5 Sadeh 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. In-line with our Whistleblowing Policy, Sadeh 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 Sadeh's business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1 Periodic training will be offered in relation to this Policy to increase awareness and understanding of Anti-Slavery and Human Trafficking legislation and the responsibilities of Staff.
- 5.2 Sadeh's 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.

6. BREACHES OF THIS POLICY

Failure to comply with this policy and/or associated regulations, may lead to disciplinary action including, in certain circumstances, dismissal.

Sadeh reserves the right to amend this policy as required

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