

## **Anti-Slavery, Ethics and Human Trafficking Policy**

Modern Slavery is a criminal offence under the Modern Slavery Act 2015 and a violation of fundamental human rights. It 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 and dignity by another in order to exploit them for personal or commercial gain.

MTC Northwest Ltd has 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 measures to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains, to the best of our knowledge.

MTC will terminate any commercial relationship with suppliers if they are in breach of our policies.

MTC Northwest, as a long established family company, employ relatively small suppliers where possible, most of which have a long working relationship with us. We believe that the majority, if not all suppliers are to be considered of a low risk of being directly or indirectly involved in modern day slavery.

The profile of suppliers that we employ help to prevent the purchase of products at unrealistically low prices that can lead to suppliers using labour, on very low wages, that are below minimum wage.

We expect suppliers to be aware of the requirements of the Slavery Act and to be aware that it is their responsibility to act in an ethical manner and to conduct their business in compliance with applicable legislation and not to engage in any forms of slavery in accordance with the Modern Slavery Act. This includes ensuring that all of their employees are engaged in line with all applicable laws and regulations.

We also expect all suppliers to not tolerate any forms of discrimination within their company, and to ensure the safety of personnel.

We make every effort to ensure that our business is conducted in an ethical and transparent manner. We offer all employees an environment that is free from harassment and unlawful discrimination. We have policies and procedures in place to achieve this goal.

Our HR department regularly conducts reviews to ensure staff are paid in accordance with legal requirements. Our recruitment process is transparent and approved by our board of directors. As part of our induction procedure we ensure all staff has 'right to work' evidence and together with identification and further training ensures that we, as a company, adhere to the Modern Day Slavery Act.

Our open door policy ensures that staff feel comfortable reporting any issues with following our procedures and policies without fear of reprisal. A breach in this policy would result in disciplinary proceedings.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels.

Stephen Gray

Managing Director

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Date of Issue: 13<sup>th</sup> July 2021