



ANTHOLOGY

Anti-Slavery Policy

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Anthology Group Limited

Anti-Slavery Policy

Policy Statement

This policy applies to Anthology Group Limited and its subsidiaries (together, "we", "us", "our"). Our company number 09678933 and our registered office is at 160-166 Borough High Street, London SE1 1LB.

Modern slavery is a crime 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 by another in order to exploit them for personal or commercial gain. For more information on modern slavery visit the Independent Anti Slavery Commissioner's website: <http://www.antislaverycommissioner.co.uk>

Our business relies upon extended supply chains in industries where modern slavery might be considered a higher risk proposition within the UK, particularly the construction, facilities management and hospitality sectors.

We strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors and suppliers, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, suppliers, contractors, consultants and representatives.

Responsibility for the Policy

The General Counsel and Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Legal and Compliance Team and 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training on it and the issue of modern slavery in supply chains.

Third Parties

If you are a third party, you shall take reasonable steps to ensure that modern slavery and human trafficking is not taking place in your supply chains or in any part of your business. Within 20 days of request, you shall provide to us a modern slavery and human trafficking report setting out the steps you have taken to ensure that modern slavery and human trafficking is not taking place in any of

your supply chains or in any part of your business. This may include, to the extent relevant, information concerning:

1. your business structure and supply chain;
2. the policies you have adopted to ensure there is no modern slavery, including human trafficking, forced or indentured labour, slavery or servitude, within your business;
3. the training and other measures used to ensure appropriate policies and procedures are applied;
4. the due diligence and monitoring conducted by your business to understand the relevant risk areas and confirm that no such behaviour is occurring;
5. a confirmation that no modern slavery issues have been identified in your business or supply chain in the last year;
6. to the extent any potential issues concerning modern slavery (including human trafficking, forced or indentured labour, slavery or servitude) have been identified within your business, the circumstances surrounding those issues and the steps you have taken to remedy such issues; and/or
7. documents evidencing the information provided in relation to the matters set out in this section.

What we do

We ensure that:

- we risk assess our business activities and supply chain in order to identify areas of risk in the context of modern slavery;
- our supply chain are selected having regard to their approach to modern slavery and their compliance record in this regard;
- we monitor our supply chain where and to the extent appropriate having regard to the perceived risk;
- our employees are aware of the Modern Slavery Act 2015 and other relevant UK laws and regulations.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the General Counsel immediately.

Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers and contractors at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

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

We may terminate our relationships with other individuals and organisations working on our behalf if they breach this policy.