

The logo for FUTERA, with the word in white capital letters and the 'E' replaced by three horizontal purple bars. The background is dark blue with glowing purple and pink diagonal streaks.

FUTERA

**Modern Slavery &
Human Trafficking
Policy 2025**

Introduction

This statement sets out the Company's action to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are also free from slavery and human trafficking.

Organisational Structure and Supply Chains

The Company currently operates its business in the United Kingdom. The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

- All potential workers undergo a selection process which rigorously checks the Right to Work in UK.
- All payments made are equivalent to or more than the National Minimum Wage.

Responsibility

Responsibility for the Company's anti-slavery initiative is as follows:

- Policies: HR further creates and manages the implementation of most policies across the business.
- Directors share accountability for assessing the risks.
- Investigations/due diligence: HR & Managers manage the process in line with the relevant policy.
- Training: All managers are briefed in this policy, and it is fully adhered to in our recruitment process.

Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- Whistleblowing policy: The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for all workers to make disclosures, without fear of retaliation.

- Employee code of conduct: The Company's Employment Agreement and Handbook makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- Supplier Procurement code of conduct: The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and where necessary improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- Recruitment policy: The Company uses only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The Company undertakes appropriate due diligence when considering taking on new suppliers, and conducts reviews its existing suppliers, when appropriate. In addition, the Company's due diligence includes:

- Evaluating the modern slavery and human trafficking risks of each new supplier where relevant
- Conducting relevant supplier audits or assessments which have a degree of focus on slavery and human trafficking where and if general risks are identified;

Training/Line Manager Briefing.

The Company requires its management to be aware of modern slavery. The Company's modern slavery briefing covers:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company or how to use the whistleblowing policy
- What steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.