

# Organisational Regulation

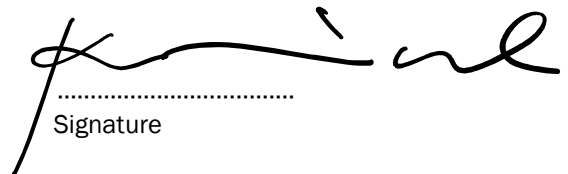
## 0-01-10

### Anti-Slavery Policy

---

Written by  
Jeremy Bromley  
HSE Manager

Approved by  
Radim Košťal  
Managing Director

A handwritten signature in black ink, appearing to read 'Radim Košťal', written over a dotted line.

.....  
Signature

Valid from  
01.10.2017

Last Revision No. 3  
15.03.2021

---

## Amendments

Date of Modification	Created by	Characteristic
11.3.2019	Gieslová	Annual update
24.3.2020	Gieslová	Annual update
7.3.2021	Gieslová	Annual update

## Table of Contents

Sheet of Changes .....	Chybal Záložka není definována.
1 Introduction .....	4
2 Anti-Slavery Policy .....	4
2.1. Processes to Combat Trafficking and Slavery.....	4
2.2. Ensuring Standards in our Supply Chain.....	4
2.3. Disciplinary Action .....	5

# 1 Introduction

Rules and bases stated in this company regulation are valid for all employees Sipral UK Ltd. and for all companies working on behalf of Sipral UK Ltd.

## 2 Anti-Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor 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. Sipral UK Limited have 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 systems and controls to ensure that modern slavery is not taking place anywhere within our own business or in any of our supply chains.

We are committed to ensuring that there is transparency in our own business and in our approach to 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, suppliers and other business partners, and as part of our contracting process, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standard.

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, contractors, external consultants, third party representatives and business partners.

### 2.1. Processes to Combat Trafficking and Slavery

We are committed to providing our staff with a salary which at least meets the National Living Wage and offering the required statutory leave entitlement. The former is audited monthly through the payroll process and procedures and the latter by independent review of the employment contract and related documentation coupled with the payroll audit. Furthermore, we ensure all our staff have provided their National Insurance Number, and Working Visa if applicable, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

The construction industry attracts a workforce from all backgrounds. In the UK, we are able to utilise the skills of employees from across the world, particularly Europe. Whilst the benefit of this influx of workers allows for a competitive market, it also has the risk of potential exploitation. By checking our employees' NI Numbers or Working Visa's we know that they are legally eligible to work in the UK and that their salary will be monitored by HMRC.

### 2.2. Ensuring Standards in our Supply Chain

Sipral UK Limited requires of all our suppliers and sub-contractor's compliance with our pre-qualification system. This is being adapted to incorporate sufficient information to ensure that we are confident that our supply chain upholds the same standards, principals and business ethics that we do. Any new contracts entered into for suppliers outside of this system will be similarly vetted and scrutinised.

Contracts will not be entered into or renewed if we feel the supplier does not reach our standards or has progressively allowed their standards to lower.

Should you require any further information, please contact us directly.

### **2.3. Disciplinary Action**

Any employee who violates our ethical standards is subject to disciplinary action which can include oral reprimand, written reprimand, suspension or termination of employment.

The Managing Director has lead responsibility for policy implementation within the Company and this policy is signed by the Managing Director to demonstrate the Board's commitment.