

# Modern Slavery Policy

## Our Policy Statement

Pruce Newman takes a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing 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 committed to ensuring there is transparency in our own business and in particular to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our sub-contractors, suppliers and business partners, and expect our supply chain to impose the same standards on their own supply chain. We will therefore require our supply chain to comply with the Act.

## Compliance with the policy

All our employees must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those that either work for Pruce Newman or are under our control to ensure the prevention, detection and reporting of any possible breaches of this policy.

All our employees are encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage. Pruce Newman encourages openness and transparency and any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised regarding this policy and our employees are encouraged to act without any fear of reprisal.

If an employee believes or suspects that there has been a breach of this policy, or that a breach may occur, they must notify their line manager or notify via Pruce Newman's Whistleblowing Procedure.

## Communication and awareness of this policy

Pruce Newman recognises its statutory obligations regarding the Modern Slavery Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains. However, we recognise that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonable able, to prevent modern slavery from occurring.

We will provide training on this policy to all our employees focusing on the risk Pruce Newman's business faces from modern slavery in its supply chains.

We will communicate Pruce Newman's zero-tolerance approach to modern slavery and this Policy to all employees, sub-contractors, suppliers, joint venture partners and any other third-party representatives and business partners at the outset of our business relationship with them and as appropriate thereafter.

We will review this Policy periodically and update it where necessary.

## Breaches of this policy

Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

**Signed:**



**Name:**

Jamie Key

**Position:**

Managing Director

**Date:**

January 2025