

## Modern slavery and human trafficking statement

February 2021

Section 54 of the Modern Slavery Act 2015 requires commercial organisations to prepare a slavery and human trafficking statement for each financial year. This duty applies to commercial organisations with a total turnover of at least £36m per year.

Whilst Anthesis is therefore not required to produce such a statement, the Company's Directors, as signatories to this policy statement, have made a conscious and purposeful decision to set out the steps the Company has in place to make sure modern slavery and human trafficking is not taking place in any part of its operations or in any of the Company's supply chain and purchasing activities.

### Policy statement

This policy statement is part of the Anthesis Corporate Social Responsibility (CSR) programme. It sets out Anthesis's actions to understand the 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 recognises its' responsibility to take a robust approach to slavery and human trafficking. Anthesis is committed to preventing slavery and human trafficking throughout its's operations and activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This policy statement will be provided to all Anthesis colleagues and will be placed on the policy section of the Company's HR Information System. The statement will also be published on the Company's website as part of its' CSR suite of policy statements.

### Practical arrangements

The Operations Director is the designated senior level person with responsibility for leading and managing the Company's practical arrangements to deliver the commitments set out in this policy statement. These responsibilities include –

- Periodic review, normally annually, of this policy statement.

In support of this policy statement, Anthesis has an Ethical policy, together with a set of key principles concerning conflict of interest, that set out the expectations of all colleagues about the way in which they conduct their work on behalf of the Company. The Company also has in place a Whistleblowing policy to support an open culture in all its' dealings with colleagues and all other people with whom it comes into contact.

- Co-ordinating the appropriate briefing, and training activities required to support effective operation of these arrangements.

As part of awareness raising about modern slavery issues, periodic team briefings include reference to the basic principles of the Modern Slavery Act 2015, how to identify potential modern slavery and human trafficking, and how any concerns should be flagged within Anthesis.

- Managing the Company's risk assessment process, including the important supplier and procurement activities.
- Leading and co-ordinating any due diligence assessments or investigations.

In addition to the supporting policies described above, Anthesis maintains the following operational arrangements as an integral part of its' safeguarding practice –

- **Supplier and Procurement code of conduct**

Anthesis is committed to ensuring that suppliers adhere to the highest standards of ethical conduct and practice. Through a rigorous due diligence assessment and vetting process, 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 due diligence assessment includes mapping the supply chain, identifying, and evaluating any modern slavery and human trafficking risks, and undertaking regular reviews.

The Company works with suppliers to ensure that they meet the standards of the code. We take this seriously and repeated violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment and agency workers policy**

We use only specified, reputable employment agencies to source labour. We always verify the practices of any new prospective agency through our established due diligence vetting and by reference to the supplier code of conduct.

## Director sign-off

This policy statement was approved on 17th February 2021



Tom Constantine  
Director



Charles Noden  
Director