

## Anti-slavery and human trafficking policy

### Policy Statement

The Sutton Venture Group Limited is committed to ensuring the fair treatment of workers throughout our business operations and that of our supply chain.

Exploitation of workers, forced labour, use of child labour, any form of slavery or human trafficking will not be tolerated.

We have employed systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

### Commitments

#### Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

The Sutton Venture Group Limited,

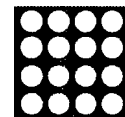
- will have a zero-tolerance approach to modern slavery
- will expect its partners and suppliers throughout its supply chains to uphold their responsibilities and conform to the Modern Slavery Act 2015.
- is committed to the prevention, detection and reporting of slavery in our organisation and supply chain. Employees and workers are required and encouraged to report any activity that might lead to, or suggest a breach of this policy. Workers reporting issues will be protected by our whistle blowing policy.
- are committed to addressing the risks of slavery in our operations and supply chain.
- take a risk based approach to processes and review them adequately. Using our risk based approach we also require our suppliers (if warranted) to comply with our Code of Conduct, which sets out the standards required to combat modern slavery and trafficking.

As part of our risk assessment and due diligence processes, Sutton Venture Group Limited consider whether circumstances warrant carrying out BSCI/SMETA audit of suppliers for their compliance of the guidelines set out by SEDEX for responsible business practise.

In conjunction with our risk based approach, Sutton Venture Group Limited may require;

- Recruitment agencies and other third parties supplying workers to confirm their compliance with the Code of Conduct
- Suppliers providing workers through a third party to authenticate the third party complies with the Code of Conduct.
- will take appropriate and proportional action against any individual or organisation working on our behalf that is found to breach this. Where possible we will seek to remediate the breach immediately, and where not feasible, will terminate supplier contracts.
- will not discriminate against current employees/workers or prospective future employees based on their colour, religion, race, sexual orientation, political views, disability, age, pregnancy or other personal characteristics.
- will ensure that wages and benefits paid to workers meet the given National legal standard within that geographical/economic area.





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Given the nature of our business activities we acknowledge that there is a risk of modern slavery occurring within our supply chain. We are committed to the continual assessment and review of our procedural systems and where necessary will adopt new protocols to ensure that we have taken all reasonable and practical steps to comply with the Modern Slavery Act 2015.

Powerforce Distribution

R K Wholesale Ltd

Connections

Sourcing Partner

Signed:

Robert Sutton

Managing Director

Date 15 06 19



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