



# Modern Slavery Policy

# FERO MODERN SLAVERY (ANTI SLAVERY AND HUMAN TRAFFICKING) POLICY

## PURPOSE

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour 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. Fero has 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 modern slavery is not taking place anywhere in our own business or in any of our supply chains. Fero is also committed to ensuring there is transparency in our own business and in our approach to tackling 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. As part of our contracting processes, we expect that our suppliers will hold their own suppliers to the same high standards.

### Types of Modern Slavery

Type of Slavery	Definition
<b>Trafficking in persons</b>	Recruitment, harbouring and movement of a person for exploitation through modern slavery.
<b>Forces Labor</b>	Forced labor includes all types of enslavement that involve coercion against one's will and a threat of punishment. Forcing a person to work or not leaving their place of work.
<b>Bonded Labor</b>	Debt bondage occurs when an individual is forced to work to repay a debt
<b>Servitude</b>	Where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
<b>Forced marriage</b>	This type of slavery occurs when an individual lacks the option to refuse marriage.
<b>Child labour</b>	Where children are: <ul style="list-style-type: none"> <li>• exploited through slavery or similar practices, including for sexual exploitation or</li> <li>• engaged in hazardous work which may harm their health, safety or morals or</li> <li>• used to produce or traffic drugs or involve in occupations that are harmful mentally or physically</li> </ul>
<b>Deceptive recruiting for labour or services</b>	Where the victim is deceived about whether they will be exploited through a type of modern slavery.

These types of modern slavery involve coercion, threats or deception

## SCOPE/TO WHOM THIS POLICY APPLIES

This policy applies to all persons working for Fero 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. This policy does not form part of any employee's contract of employment and Fero may amend it at any time.

## RESPONSIBILITY FOR POLICY

Fero Directors have overall responsibility for ensuring this policy with senior management; and managers have day to day responsibility to ensure compliance with our legal and ethical obligation. The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Managing Director. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Managing Director. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Fero is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure which can be found in the policy manual or from the HR department.

## COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Fero may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.