



## Modern Slavery and Human Trafficking Policy

V3.2 – October 2022



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### Safelane Global Limited

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## Version History

| Version | Last Updated | Details  | Author      | Approved By             |
|---------|--------------|--|-------------|-------------------------|
| 2.0     | 27/09/2018   | Rebranding and review  | L James     | A Ainsworth             |
| 2.1     | 12/11/2019   | Rebranding and review  | L James     | A Ainsworth             |
| 3       | 05/05/2020   | Added WB + AD Morgan, corrections and formatting                         | C Robertson | A Ainsworth             |
| 3.1     | 19/04/2021   | Updated to new branding<br>Updated slavery definition<br>Updated wording | C Robertson | A Ainsworth<br>R Hunter |
| 3.2     | 13/10/2022   | Annual Review  | K Tsiminis  | R Hunter                |

## Disclaimer

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## SafeLane Global Companies

The SafeLane Global Companies Comprise of **SafeLane Global Limited** and **W.B. AND A.D. MORGAN LTD.** The SafeLane Global Companies shall be referred to as **SafeLane Global** through the rest of this document.

## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Modern slavery and human trafficking is a crime and a violation of human rights. Modern Slavery is a complex crime that can take various forms, such as;

- Labour Exploitation: victims are forced to work for nothing, low wages or a wage that is kept by their owner; work is involuntary, forced and/or under the threat of a penalty, and the working conditions can be poor
- Sexual Exploitation: victims are exploited through non-consensual abuse or another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-legitimate purpose
- Domestic Servitude: victims are domestic workers who perform a range of household tasks (for example, cooking and cleaning); some live with their employers and have low pay, if any at all
- Criminal Exploitation: victims are forced to work under the control of criminals in activities such as forced begging, shoplifting, pickpocketing, cannabis cultivation, drug dealing and financial exploitation
- Organ Harvesting: living or deceased victims are recruited, transported or transferred, by threat or force for money, for their organs

SafeLane Global Ltd Is committed to zero tolerance of Modern Slavery and Human Trafficking within the company, or our supply chain. We work internationally, acting ethically and with integrity across all business activities, implementing and maintaining effective systems and controls to safeguard against any form of modern slavery or human trafficking.

SafeLane Global is committed to ensuring there is transparency in our business, and our approach to preventing modern slavery, consistent with the requirements of the Modern Slavery act 2015. We expect our contractors, suppliers and other business partners to also have a zero tolerance approach for modern slavery.

SafeLane Global have implemented internal policies and procedures to ensure that company business practices are conducted ethically and with transparency.

Some examples include;

- Anti-Corruption and Bribery Policy
- Anti Harassment and Bullying Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Public Interest Disclosure Act (whistleblowing) Policy

This policy applies to but is not limited to all persons working for or on the behalf of SafeLane Global (**SafeLane Global Limited** and **W.B. AND A.D. MORGAN LTD**). This includes all employees, directors, agency workers, temporary workers, contractors, apprentices, external consultants and representatives, and business partners.

## Our Suppliers

SafeLane Global's supplier policy ensures the maintenance of an approved supplier list. Due diligence is conducted on all key suppliers before approval. This includes, but is not limited to supplier questionnaires requiring evidence to support their policy on Anti-Slavery and Human Trafficking. All suppliers are required to confirm that their business practices do not contradict this policy.

## Responsibility for the Policy

- The Board of Directors has overall responsibility for ensuring this policy is compliant with our legal and ethical obligations and that all those employed or contracted to the board are compliant.
- The CEO and CFO have primary and day to day responsibility for implementing this policy and monitoring its use and effectiveness.
- Management at all levels are responsible for ensuring those reporting to them are made aware of, understand, and receive relevant training on the issue of modern slavery and human trafficking.
- All persons working for, or on behalf of SafeLane Global, are responsible for ensuring this policy is adhered to.

## Communication & Awareness of this Policy

SafeLane Global will provide regular internal training as necessary and where appropriate.

SafeLane Global's zero-tolerance approach to modern slavery will be communicated to all suppliers and persons working for or on behalf of SafeLane Global.

## Compliance with this Policy

The prevention, detection and reporting of modern slavery in any area of the company business or supply chain is the responsibility of all those working for, or on behalf of the company. They are required to avoid any activity that could be interpreted as or might lead to a breach of this policy.

Any concerns or suspicions about modern slavery, human trafficking, conflicts of interest or breaches of this policy within the business or supply chain must be raised immediately in accordance with the company whistleblowing policy.

The company encourages openness and will ensure anyone raising genuine concerns under the scope of this policy can do so without fear of reprisal, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately.

Any breaches of this policy may result in the organisation taking disciplinary action against individuals, and/or the termination of its relationship with any organisation or supplier.

**Rob Hunter – Acting CEO**



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## GLOBAL



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