



# Froneri Group Anti-Modern Slavery Policy

Policy Owner:	Chontelle Wright (Group General Counsel)
Approval:	Froneri International Ltd Board
Policy Audience:	All colleagues
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## Anti-Modern Slavery Policy

Froneri is committed to maintaining the highest standards of ethics and integrity in the conduct of its business. Slavery and human trafficking are crimes and a violation of human rights. We have a zero-tolerance approach to slavery and human trafficking.

Slavery and human trafficking involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and encompasses practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable groups; and arranging or enabling the trafficking of persons.

The following key principles apply to our business and suppliers:

- Child (under 16 years of age) labour must not be used and we and our suppliers must not benefit from child labour.
- Any form of forced or compulsory labour must not be used and we and our suppliers must not benefit from forced or compulsory labour. Workers must be free to leave employment or work after reasonable notice.
- Passports should not be taken from workers.
- All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay.
- Compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- The formation of trade unions and powers of collective bargaining should be respected.
- Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health.

We are committed to implementing and enforcing effective systems and controls to ensure slavery or human trafficking are not taking place anywhere in our own business or in any of our supply chains. We conduct due diligence on suppliers. We will not do business with suppliers who do not follow our anti-slavery and human trafficking principles.

On an annual basis we publish on our website an anti-slavery statement which will set out our approach to prevent slavery and human trafficking in connection with our business.



Any concerns relating to a breach of this Policy may be reported via the Froneri whistle blower line (See the Froneri Group Integrity Call Policy for local contact numbers in your country or visit: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)).

A handwritten signature in blue ink, appearing to read "Ibrahim Najafi".

**Ibrahim Najafi**

**Chief Executive Officer**

**12<sup>th</sup> February 2024**



## **1. Purpose and Objective**

- 1.1 This Policy is intended to ensure that slavery or human trafficking is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 This Policy applies to our directors; officers; and employees (referred to as "Colleagues"). We expect the highest standards from our Colleagues, and we have a zero-tolerance approach to slavery and human trafficking.
- 1.3 We also expect all people and businesses who perform services for us, for example, agents, sub-agents, advisors, consultants, suppliers, contractors and freight forwarders (referred to as "Service Providers") to share our zero-tolerance approach to slavery and human trafficking.
- 1.4 This Policy applies irrespective of the country in which Froneri is conducting its business. Where there are differences between the local law and this Policy, you must comply with the highest standard of behaviour.
- 1.5 This Policy is an internal document and cannot be shared without prior authorisation from Group Legal.
- 1.6 Where there are differences between these Policy requirements and the local law, you must apply whichever sets the highest standard of behaviour.
- 1.7 We reserve the right to change this Policy at any time and the updated Policy will be published to Country Managers and made available on the Froneri intranet.

## **2. Policy Requirements**

- 2.1 Each Froneri Group business must implement their own Anti-Modern Slavery Policy which incorporates these minimum policy requirements. Copies of such policies must be available for inspection by Group Legal at any time. Related policies and guidelines as well as template documents referenced in this Policy are available from Group Legal to help Froneri businesses implement their own local policies.
- 2.2 Country Managers, Heads of Finance, departments, and managers are responsible for implementing their own local policies including appropriate practices, processes, controls, and training.

## **3. What is Modern Slavery?**

- 3.1 Slavery or human trafficking includes practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children or other vulnerable people; arranging or enabling the trafficking of persons; or any other practice that involves depriving any person of their liberty or freedom in order to exploit them for personal or commercial gain.
- 3.2 Slavery or human trafficking can be hard to spot but it can be thought of in three categories:



Human trafficking	Labour exploitation	Other slavery like practices
<p>1. Recruitment, transportation, transfer, harbouring or receipt of persons;</p> <p>2. By means of threat, force, coercion, abduction, fraud, deception, or the abuse of power or vulnerability;</p> <p>3. With the intent of exploiting that person through: prostitution; sexual exploitation; forced labour; slavery; servitude; or removal of organs.</p> <p><i>(Exerts from the UN Trafficking Protocol, 2000)</i></p>	<p>All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.</p> <p><i>(International Labour Organization. Forced Labour Convention, 1930 (No. 29))</i></p>	<p>Attaching and exercising some form of ownership of a person which deprives them of their freedom. It includes slavery-like practices: debt bondage, forced marriage, sale or exploitation of children.</p> <p><i>(Summary of the Slavery Convention (1926) and Supplementary Slavery Convention (1956))</i></p>

#### 4. What is Expected of You?

- 4.1 All **Colleagues** must read and observe the requirements of our Anti-Modern Slavery Policy. They must act with honesty and integrity and comply with all applicable laws, whether or not specifically covered by our policies.
- 4.2 **Group General Counsel** is responsible for the day-to-day oversight of the Anti-Modern Slavery Policy.
- 4.3 **Managers** should work to create an environment that encourages compliance with the Anti-Modern Slavery Policy. Supervision of responsible business practices is as important as supervision of performance. You should encourage those you manage to report any concerns and to ask any questions they have regarding Modern Slavery issues. Managers should ensure that they always look out for any red flags of Modern Slavery in all conversations that they have with those that they manage, including and one to one or review meetings. Managers should report any Modern Slavery concerns they may have about a particular employee to the Group General Counsel or via the Froneri whistle blower line (see the Froneri Group Integrity Call Policy for local contact numbers in your country or visit: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)).
- 4.4 **Service Providers and Joint Venture Partners** are expected and encouraged to adhere to the principles of our Anti-Modern Slavery Policy and to act with honesty and integrity and comply



with all applicable laws, whether or not specifically covered by the Anti-Modern Slavery Policy or any of our other policies.

- 4.5 This Policy cannot address every conceivable situation. In many circumstances, the law or this Policy will clearly dictate what you should do, but on other occasions the situation will require you to exercise judgement. Always err on the side of caution.

## **5. Modern Slavery Red Flags – Service Provider**

- 5.1 Colleagues should look out for modern slavery "red flags". Any red flags should be reported immediately to the Group General Counsel or via the Froneri whistle blower line (the Froneri Group Integrity Call Policy for local contact numbers in your country or visit: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)).

- 5.2 The following signs may give rise to suspicions that slavery or human trafficking could exist in the business of a service provider:

- Workers being subjected to excessive overtime or other overly demanding conditions;
- The supplier providing accommodation for their workers, which may be substandard;
- Lack of grievance mechanisms for employees, or an absence of union representation;
- Reluctance to allow third party factory inspections or audits;
- The business having no policy or programme in relation to slavery or human trafficking, or no similar employee policies;
- Interviews or conversations with workers giving rise to concerns;
- Instances of slavery or human trafficking identified in the supplier's business, or a linked company;
- The manufacturing operations of a supplier being based in countries more prone to slavery; or
- Immigrant workers employed by the supplier being from a country that is more prone to slavery.

## **6. Modern Slavery Red Flags – Workers**

- 6.1 If someone is a victim of Modern Slavery their behaviour, working conditions, or finances may give an indication that they are subject to slavery-like practices.

- 6.2 Colleagues should look out for modern slavery "red flags". Any red flags should be reported immediately to the Group General Counsel or via the Froneri whistle blower line (see the Froneri Group Integrity Call Policy for local contact numbers in your country or visit: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)).



## Behaviour

6.3 Victims of modern slavery may:

- Shows signs that their movements are being controlled.
- Be threatened with being handed over to authorities.
- Depend on their employer for work, transport and accommodation without any choice.
- Only travel with other workers.
- Have limited contact with their families or people outside their immediate work environment.
- Have their passports removed.
- Be required to pay recruitment fees out of their wages.
- Be in a situation of dependence.
- Come from a place known to be a source of slavery or human trafficking.
- Be afraid of revealing their immigration status.
- Show fear or anxiety.

## Working/Living Conditions

6.4 Victims of modern slavery may:

- Have no contract.
- Be unable to negotiate working conditions.
- Be forced to work under certain conditions.
- Work excessively long hours over long periods.
- Not be dressed adequately for the work that they do: for example, they may lack protective equipment or warm clothing.
- Not interact with work colleagues.
- Lack basic training or professional licences.
- Believe they are obliged to work without pay in return for provision of accommodation.
- Live in poor or substandard accommodation, or have no choice where they live or who they live with.
- Live in groups in the same place.



## Finances

6.5 Victims of modern slavery may:

- Receive little or no payment.
- Have no access to their earnings, or only receive a portion of their earnings.
- Be disciplined through punishment or fines.
- Be under the perception that they are bonded by debt.
- Have the fees for their transport to a destination country paid for by their employer or facilitator, which they must pay back through work.
- Be charged for services they do not want or need.
- Be forced to open bank accounts, which may be under the control of others.
- Have wages paid into an account used or controlled by other people.
- Have bank cards / documents held by someone else.

## 7. Due Diligence Risk Assessment

- 7.1 Each Froneri business must adopt proportionate and risk based due diligence procedures to ensure they know who they are doing business with.
- 7.2 Each Froneri business must conduct periodic and proportionate risk assessments of our supply chains in relation to slavery and human trafficking giving consideration to country risk and product/service risk.
- 7.3 On the basis of this risk-based approach, where flags arise, anti-slavery and human trafficking due diligence will be undertaken on our Service Providers, including self-assessment questionnaires and, for higher risk Service Providers, on-site assessments.

## 8. Service Providers

- 8.1 We expect the same standards from our external Service Providers as we do from our Colleagues.
- 8.2 All Service Providers (whether individuals or companies) should be advised of our Modern Slavery Statement and provided with the Froneri Supplier Code of Conduct which sets out our zero-tolerance approach to slavery and human trafficking and required contractually to comply with it.
- 8.3 If a Service Provider is identified as high risk from a Modern Slavery perspective, we will implement additional controls to manage this risk including contractual clauses and audits. Please contact Group Legal for guidance on managing Service Providers who are deemed high risk.
- 8.4 Each department must keep adequate records of all its Service Providers and the date when due diligence was last conducted.





## **9. Modern Slavery Statement**

- 9.1 The UK Modern Slavery Act 2015 requires certain businesses to publish an anti-slavery and human trafficking statement each financial year. This statement must set out the steps taken in the preceding 12 months to ensure that slavery and human trafficking is not taking place in its supply chains or any part of its own business ("Anti-Slavery Statement").
- 9.2 On an annual basis Froneri HQ will publish an Anti-Slavery Statement which will set out our approach to prevent slavery and human trafficking in connection with our business.
- 9.3 We will review and update our Anti-Slavery Statement annually taking into account any developments in the preceding 12 months.
- 9.4 We will publish a link to our Anti-Slavery Statement on the homepage of our website.
- 9.5 The Anti-Slavery Statement will be approved and signed by a member of the board of directors.
- 9.6 We intend to add our statement to the UK government's registry of modern slavery statements.

## **10. Reporting Suspected Non-Compliance**

- 10.1 Colleagues must report any breaches or potential breaches of the Anti-Modern Slavery Policy as soon as possible. You can report your concerns directly to the Group General Counsel, or via the Froneri whistle blower line (see the Froneri Group Integrity Call Policy for local contact numbers in your country or visit: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)).
- 10.2 Any Service Provider or Joint Venture Partner who suspects or is aware of any breaches of our Anti-Modern Slavery Policy must immediately notify their contact at the company, who must in turn report this directly to the Group General Counsel, or via the Froneri whistle blower line (see the Froneri Group Integrity Call Policy for local contact numbers in your country or visit: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)).
- 10.3 We will take all reported concerns seriously and will confidentially investigate to determine if the law or our Anti-Modern Slavery Policy has been contravened.

## **11. Scope and Exceptions**

- 11.1 This Policy applies to all Froneri businesses and colleagues.
- 11.2 This Policy does not override any applicable laws in countries where Froneri operates. If a local Froneri business is subject to more stringent local laws, the higher standard will apply.
- 11.3 Any local variations to or derogations from this Policy are only permitted with the prior written approval of the Group General Counsel.



## **12. Roles and Responsibilities**

- 12.1 Anti-slavery and human trafficking training must be provided to all relevant Colleagues at least once every 3 years (or more frequently, if circumstances require). Group Legal may deliver training throughout the year. However local businesses should also deliver additional training where appropriate, e.g. to address specific risks and knowledge gaps, or to explain local legal requirements.
- 12.2 We also make all Colleagues aware of "red flags" of slavery and human trafficking that they should consider when dealing with Service Providers during contractual negotiations, site visits or any interaction with a Service Provider and its workers.
- 12.3 The Group General Counsel will monitor compliance with our Anti-Modern Slavery Policy.
- 12.4 Group Internal Audit will carry out Anti-Modern Slavery audits on a periodic basis. The due diligence information gathered for Service Providers will be sampled during these audits.

## **13. Froneri Delegation of Authority References (DOA)**

N/A

## **14. Consequences for Non-Compliance**

- 14.1 We may take appropriate disciplinary action, up to and including termination of employment, against any Colleague who fails to comply with the Anti-Modern Slavery Policy, or applicable laws. In addition, any Colleague who breaks the law may be reported to the police and may face criminal proceedings, fines or imprisonment.
- 14.2 For Service Providers and Joint Venture Partners, non-compliance with our Anti-Modern Slavery Policy and any applicable laws will be considered to be a material breach of contract and may result in the termination of any relationship with us and the matter being reported to the appropriate authorities.

## **15. Contacts**

If you have any questions about anything in our Anti-Modern Slavery Policy or about any modern slavery issue which is not covered in our Anti-Modern Slavery Policy, please contact the Group General Counsel.