

## Anti-Slavery and Human Trafficking Policy

### Policy Statement

Breckenholme Trading Company (B.T.C.) is a family run business and as such has zero tolerance approach to modern slavery. We strongly believe in putting relationships with our clients, suppliers, employees and the general public first. We will work, to the best of our ability, in an honest and open way cultivating trust and long-term partnerships. In this respect we are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and expect the same standards from our suppliers.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

### Compliance with Laws

BTC is committed to complying with all applicable laws and regulations related to slavery and human trafficking, including but not limited to the Modern Slavery Act section 54(1) of the Modern Slavery Act 2015 and other international conventions.

### Risk Assessment

BTC conduct regular risk assessments as part of our accreditation program to identify and evaluate potential risks of slavery and human trafficking within our operations, supply chains, and business relationships. This assessment helps us develop appropriate strategies to mitigate and address these risks effectively.

### Due Diligence

BTC implement due diligence procedures to assess and monitor our suppliers, contractors, and business partners to ensure their commitment to anti-slavery practices. This includes evaluating their policies, procedures, and practices related to slavery and human trafficking.

### Training and Awareness

BTC will provide regular training and awareness programs to our employees to educate them about the signs of slavery and human trafficking. This training equips them with the knowledge and tools to identify, report, and prevent such practices.

The procurement department and directors have primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing control systems and procedures to ensure they are effective in countering modern slavery.

Management ensures that employees are given the required training in order to understand and comply with this policy.

### Reporting Mechanisms

BTC have confidential reporting channels to encourage employees to report any suspicions or incidents of slavery or human trafficking. We ensure that all reports are treated with utmost seriousness, and appropriate actions are taken to investigate and address them.

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### **Investigation and Remediation**

In the event of reported incidents, we conduct thorough investigations to determine the veracity of the claims. If any violations are substantiated, we take immediate action, which may include terminating relationships with involved parties. We also provide support to victims and collaborate with relevant authorities as required.

### **Continuous Improvement**

BTC are committed to continuously reviewing and improving our anti-slavery and human trafficking policy. We stay updated on emerging best practices, industry standards, and legal requirements to ensure the effectiveness of our efforts in combating these crimes. BTC expects all employees and suppliers to uphold this policy and actively contribute to the prevention and elimination of slavery and human trafficking.

Signed

Ben Palmer  
Director BTC

Dated: 28-July-2023