

Modern Day Slavery & Human Trafficking

Statement & Policy

Modern Slavery is a crime and violation of a persons fundamental Human Rights. There are many forms of Modern Slavery such as: Slavery, Servitude, Forced Labour and Human Trafficking. All of which deprive a person of their liberty for personal or commercial gain.

Farol Ltd. is committed to ensuring that no acts of Modern Day Slavery or Human Trafficking occur within its business or supply chain. Farol Ltd. acknowledges responsibility within the Organisation and with suppliers of goods and services to the Organisations.

Structure and Supply Chains. Farol Ltd. is a single entity operating solely in the United Kingdom.

- Farol Ltd. will not support or deal with any business or person knowingly involved in Modern Day Slavery or Human Trafficking.
- We will assess our supply chain and to strive towards low risk or consider alternative sources/suppliers/products or where there is scope to improve, to avoid unacceptable risks. With a number of suppliers within the UK and EU, where suppliers or their ultimate parent companies are outside of the EU we will make every effort to ensure those supplier uphold the provisions of the Modern Slavery Act (MSA).
- This means we must be aware of specific environmental, social and economic issues associated with a product's production process and where necessary we will draft social, economic and environmental criteria for inclusion within the specification. We aim to identify and deal with the risk of serious activity such as fraud, corruption, bribery and modern slavery, and to achieve visibility over complex and deep supply chains and support ethical trade initiatives.
- Farol will undertake due diligence on both new and existing suppliers on a periodic basis. This consists of reviewing suppliers and supply chains for weaknesses in management or governance, reviewing supply chains for geographical or political exposure to risk and reviewing policies of existing suppliers.
- Farol Ltd. reserve the right to terminate any relationship / contract with an individual or business if they breach this Policy or are believed to be involved in Modern Slavery or Human Trafficking.
- Although the Directors have responsibility for the Management of this Policy, the Policy applies to everyone working for or on behalf of Farol Ltd. and includes: Directors, Managers, Officers, Employees, Casual or Agency Workers, Contractors, and Consultants etc.
- All employees / representatives of Farol Ltd. are required to avoid any activity that might relate to Modern Slavery or Human Trafficking.

- Farol will conduct a risk assessment of its supply chains, reviewing any significant changes to major suppliers, and identifying any potential exposure within our existing suppliers to increased risk of slavery or human trafficking.
- Performance indicators - Farol conducts appropriate reviews of its suppliers which is based on their size and complexity.
- You must inform Farol Ltd. immediately if you suspect a person or a business is involved with Modern Slavery or Human Trafficking.
- Policies will reinforce our actions. In addition to this Policy we maintain a Whistleblowing Policy to encourage all employees and other business parties to report any concerns over its activities to the appropriate person within the company without fear of compromising their own position). We have appropriate Employee Conduct Policies to set out the Company ethics and core values along with the standard of behaviour expected by all staff.
- If you suspect that this Policy has been breached you must notify a member of Management immediately. We aim to be open in our dealings and encourage this; we will support any person who raises a genuine concern, even if it turns out to be mistaken.
- You may face disciplinary proceedings if you are found to be in breach of this policy.
- We will keep this Policy under review in light of changes to current legislative guidance, changes to the organisational structure and supply chains, as part of the risk assessment or after any suspected breaches or raised concerns.
- Where relevant to the role, there will be staff training on slavery and human trafficking which at the very least is to read and accept this Policy.

Signed on behalf of Farol Ltd.



Name: Matthew Vellacott, Managing Director

Date: July 2018

Last Review Date: 04/01/2021