

# MODERN SLAVERY POLICY

DATE: April 2024

REVIEW DATE:  
April 2025

VERSION:6

## **Overview**

This policy sets out Swan Family actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. Swan Family maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, we are absolutely committed to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chain is free from slavery and human trafficking.

## **Organisational Structure and Supply Chains**

This policy covers all the activities of Swan Family and its subsidiaries. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Swan Family to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

## **Responsibility**

The HR department will liaise with other relevant departments to ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required.

## **Relevant Policies and Practices**

Swan Family operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Our policy on whistleblowing encourages all workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Whistleblowing Policy. The nature of the complaint will determine the next course of action.

## **Awareness & Performance Indicators**

As well as training employees, Swan Family will raise awareness of modern slavery issues by emailing out the anti-slavery and human trafficking policy to all employees. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

This policy on modern slavery will be communicated to all suppliers, contractors and business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.