



# Modern Slavery Policy

## 1. Policy Purpose

The purpose of this policy is to ensure that Widgit maintains a zero-tolerance approach to any form of modern slavery within our business or supply chain. The policy reflects our aim to act transparently, respectfully and with integrity in all our business relationships.

## 2. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our own business or in our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.

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

### 3. Responsibility for the Policy

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The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

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

### 4. Staff Compliance with the Policy

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Staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

#### Reporting a breach

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business, or supply chains of any supplier tier at the earliest possible stage.

If staff believe or suspect a breach of this policy has occurred or that it may occur, they must notify their manager as soon as possible. Staff should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with their manager.

#### Preventing detrimental treatment

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery (of whatever form) is or may be taking place, in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, they should inform the compliance manager immediately. If the matter is not remedied, the staff member should raise it formally using our Grievance Procedure.

## 5. Communication and Awareness of This Policy

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Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 6. Breaches of This Policy

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We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

## 7. Policy Review

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This policy will be reviewed every **3 years**, or sooner if changes in legislation occur or new best practice evidence becomes available.

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