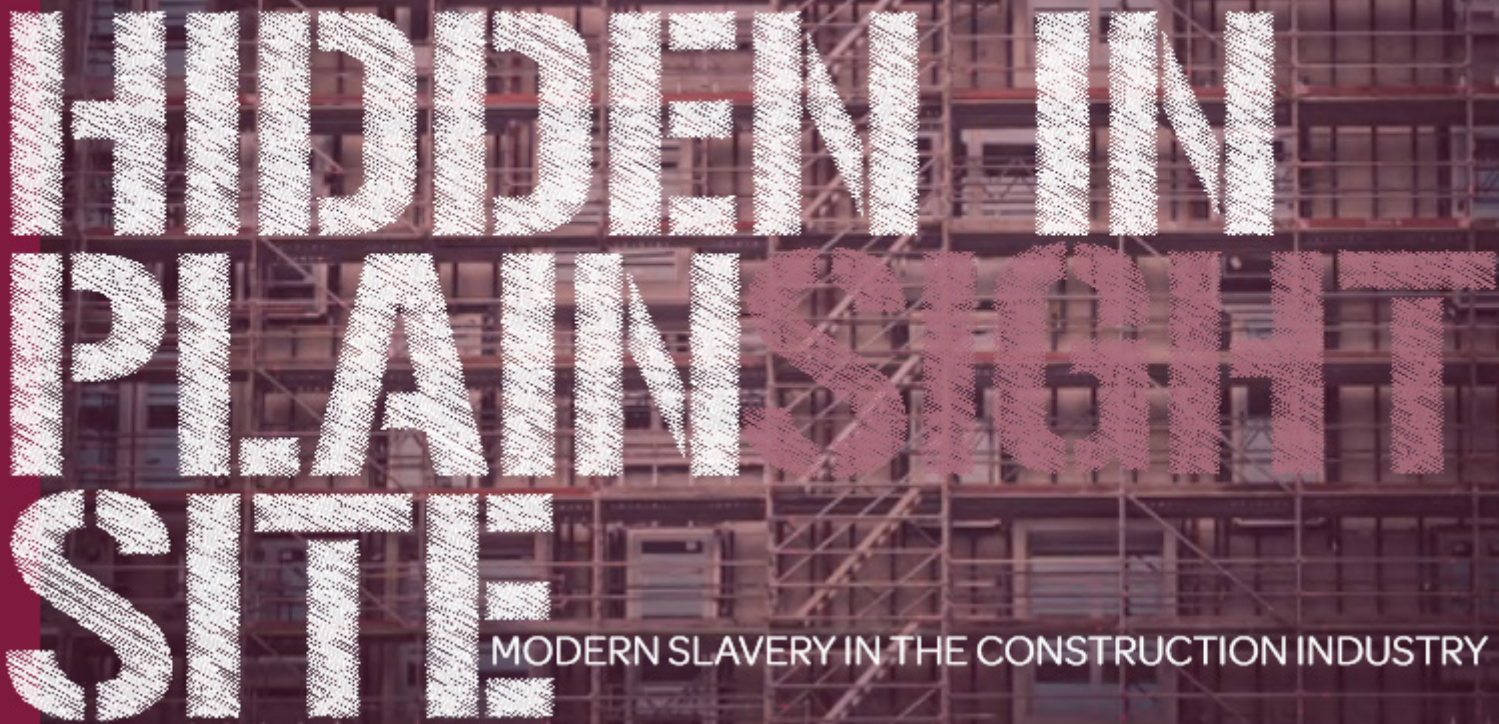


# MODERN SLAVERY POLICY





## INTRODUCTION

Linear UK Group Ltd remains committed to meeting the requirements of the Modern Slavery Act 2015 and preventing modern slavery in all our company activities, and ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking. We recognise that slavery and human trafficking remains a hidden affliction on our society. We all have a responsibility to be vigilant to the risks, however small, in our business and in the wider supply chain. We have a zero-tolerance to this issue and expect our people, suppliers and sub-contractors to comply with our values. Our Anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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## DEFINITIONS

**Modern Slavery:** Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude force or compulsory labour, or facilitation their travel with the intention of exploiting them soon after.

**Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

**Safeguarding:** Safeguarding adults includes: Protecting their rights to live in safety, free from abuse and neglect. People and organisations working together to prevent the risk of abuse of neglect and to stop them from happening.

**Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

**Whistle Blowing:** Whistleblowing occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others. The Public Interest Disclosure Act 1998 is the key piece of UK legislation protecting individuals who 'blow the whistle' in the public interest.

**Supply Chain:** A supply chain is the entire process of making and selling commercial goods, including every stage from the supply of materials and the manufacture of the goods through to their distribution and sale.



## POLICY

The Linear UK Group aims to use all reasonable endeavours to ensure that no Modern Slavery or Human Trafficking is taking place in the organisation or any part of their Supply chain.

The objectives of this Policy are:

1. To follow a rigorous procedure for conducting right to work checks in high-risk areas and locations.
2. To raise awareness to the Linear UK Group Ltd supply chain and to offer training to all Linear staff of the risk of Modern Slavery and Human Trafficking, particularly those whose work is involved with at risk areas and locations.
3. To audit and scrutinise the Linear UK Group Ltd supply chain, including agencies, and self-employed workers to ensure they are taking reasonable steps to eradicate Modern Slavery and to treat workers right in their own organisations.
4. To confirm that the minimum wage or above is being paid to all workers

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## REQUIREMENTS FOR SUPPLIERS

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to Linear, also adhere to these requirements.



## WHAT WE DO

To ensure compliance across all of our sites and offices, including employees, self-employed operatives and supply chain member including agencies, Linear will conduct random interviews on site. These interviews will be co-ordinated and managed by the HR Director.

- Interviews are carried out in a private room.
- Interview process is explained to the interviewee.
- The same question set will be followed at all interviews.
- Status of RTW will be checked during the interviews.
- Confirmation that minimum wage or above is being paid.
- Conversation around living situation.
- Conversation around treatment on site.

## CONSEQUENCES

The Linear UK Group takes any breach of this Policy extremely seriously.

Supply Chain Members who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with Linear terminated immediately, without compensation.

If a Supply Chain Member to Linear is found in violation of this policy, Linear will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supply Chain Member (as above). It shall also take such other (remedial) steps as the Anti-Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

Note: The scope of this policy includes Linear UK Group Ltd, Linear Projects Ltd, Linear Design & Construct Ltd, Linear Design & Construct Manchester Ltd, Linear Fire Safety Ltd, Linear Building Compliance Ltd & Linear Living Ltd.

Signed: 

Date: 20/05/2024

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