



**Actiform Ltd
Queens Buildings
Lowlands Road
Mirfield
West Yorkshire
WF14 8LX**

SLAVERY AND HUMAN TRAFFICKING POLICY

ACTIFORM LTD are committed to preventing the use of forced, bonded, or indentured labour, involuntary prison labour, slavery or trafficking of persons. As such we look beyond strictly economic objectives and minimum legal requirements and consider the wider implications of our business decisions.

We are an equal opportunities employer and are committed to creating and ensuring a non-discriminatory and respectful working environment for our workers. We want all our workers to feel confident that they can expose wrongdoing without any risk to themselves.

We have an ethical trading policy and take into account our supply chains ethical trading policies as well as our own. ACTIFORM LTD (Actiform) is committed to monitoring standards in our supply chain, and we encourage our suppliers to operate the same standards we employ ourselves.

Our recruitment processes ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We will not use or tolerate the use of forced, debt bonded, indentured labour, involuntary prison labour, slavery or human trafficking in our business or supply chain. This includes the recruiting, harbouring, transporting, providing, receiving, or obtaining a person by the use of force, fraud, coercion, abduction or fraud for the purpose of involuntary servitude, debt bondage, slavery or similar.

We will never place any unreasonable restrictions on our workers freedom of movement or any unreasonable restrictions on entering or exiting facilities we provide. All work within our company must be voluntary.

We will not destroy, conceal, hold or otherwise deny access by employees to their identity documents or passports, work permits or drivers' licenses regardless of the situation. Except where documents have to be held as required by the law.

If we use migrant workers we will not allow them to pay for their employment. Any recruiters used to source workers must comply with any local laws of the country where the recruitment takes place.

The costs of recruiting and hiring, transportation (to facility and return home), or any government imposed fees shall be paid directly by the supplier. Any fees charged to the workers must be disclosed and returned to them. Workers shall not be required to post any bond or make any deposit.

The worker shall not be required to participate in any savings programme unless required by law. Working conditions, pay, benefits and treatment of migrant workers must be the same as local workers. Worker dormitories contracted or provided by the supplier or a labour agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space.

Training

We provide ongoing guidance for our employees so they are aware of our commitment and policy on slavery and human trafficking. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide general training to our Employees.

For those employees who liaise more closely with contractors, suppliers etc. we will provide more in depth and targeted guidance so that can combat and identify any potential situations of modern slavery.

Supplier/Contractors Adherence to Our Policy and Ethics

To ensure all those in our supply chain comply with our values we have included specific human rights and anti-Slavery and Trafficking related provisions in all relevant contracts.

With respect to our suppliers that may need to source and hire foreign migrant workers, the supplier shall provide the migrant worker with a written employment agreement in their native language that describes the terms and conditions of employment. The supplier shall provide this agreement to the migrant worker as part of the job offer process and the worker shall sign it prior to departing from his or her country of origin.

Due Diligence Processes Regarding Slavery and Human Trafficking

As part of our policy to identify and mitigate risk, we conduct due diligence prior to engaging with a supplier, contractor etc. The level and content of the due diligence depends on the company's risk profile and proposed activities. Our internal due diligence process includes completion and assessment of a compliance questionnaire. "High Risk" companies are screened by an external party, reporting on litigation, adverse media and similar.

We perform periodic due diligence updates on companies based on perceived risk and on the type or category of the products and services that we obtain. These will be assessed against published modern slavery indexes and country specific risk analysis made available to the public by dedicated reputable organisations (such as the Global Slavery Index).

Companies identified as High Risk with respect to human rights and modern slavery will be subject to specific and more frequent assessment.

We also have in place systems to enable and protect whistleblowers, which complement and strengthen our anti-slavery due diligence and monitoring processes.

We also have procedures in place to report potential ethical, legal or regulatory violations related to our suppliers.

Our Continued Commitment

As a company operating with strong commitment to high legal and ethical standards, we will continue to assess our business at all times.

Any issues identified will be addressed promptly, and we are committed to combatting the use of any form of modern slavery at all levels of our supply chains.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Signed by the person with overall responsibility:



S H Dransfield
Managing Director

Date: 18th March 2025