

Stratstan Ltd
Slavery Policy

Stratstan Ltd are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chain or in any part of our business. 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 in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, external consultants, third-party representatives. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Our aim is to ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

We will achieve this aim by our commitment to identify and mitigate risk in the following ways (but not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work.

- Encourage the reporting of concerns and the protection of whistle blowers.
- Stratstan Ltd will not knowingly support or deal with any business involved in slavery or human trafficking.

We have zero tolerance to slavery and human trafficking.

COMPLIANCE WITH THE POLICY

Employees 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 chain is the responsibility of all those working for us or under our control.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. They must notify a Director as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage. If they believe or suspect a breach of this policy has occurred or that it may occur you must notify a Director as soon as possible. If they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with a Director.

Stratstan Ltd aims 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 part of our supply chain. If employees believe that they have suffered any such treatment, they should inform a Director immediately.

COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern

slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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 training to relevant members of staff as required.

This policy is in accordance with section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

This policy applies to all Stratstan Ltd employees.

Simon Tuffen



Managing Director