



Anti-slavery, human trafficking and labour standard 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 in order to exploit them for personal or commercial gain.

1. Policy Statement

1.1 The Company has a zero-tolerance approach to modern slavery and we are committed to:

- acting ethically and with integrity in all our business dealings and relationships;
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains and that our suppliers comply with all applicable laws in the territories in which they operate;
- Continual improvement and periodic review of this policy, taking into consideration changes in legislation, and any other requirements, in order to ensure its adequacy, suitability and continuing effectiveness and
- Making sufficient resources available for the implementation of this policy.

1.2 We are also committed to ensuring there is a transparency in our own business and in our approach to achieving the minimum standards set out in section 3 of this policy (**the 'Minimum Standards'**) tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners. The Company expects its suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, volunteers, apprentices, external consultants, contractors, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

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

2.2 The Company 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 meet the Minimum Standards, and that they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

3. Minimum Standards

3.1 Braun recognises the correlation between poor labour standards and poor quality goods and services. As such, Braun is committed to ensuring both it and its suppliers reach minimum labour standards at all times.

3.2 These minimum labour standards, devised by reference to Social Accountability International's SA8000 document and the UN Universal Declaration on Human Rights, are as follows:

(a) **Child Labour** – Braun does not engage in or support the use of child labour. If Braun engages any young workers (for example, on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.

(b) **Forced & Compulsory Labour** – Braun shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.

(c) **Health & Safety** – Braun shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimising, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with Braun. Employees shall have access to clean sanitary facilities and drinking water.

(d) **Freedom of Association** – the freedom of association is respected and Braun will comply with UK labour relations legislation in this regard.

(e) **Discrimination** – Braun shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination.

(f) **Disciplinary Practices** – Braun shall treat all employees with dignity and respect. Braun shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is permitted.

(g) **Working Hours** – Braun shall comply with applicable laws and industry standards on working hours and holiday entitlements. Braun's normal working hours do not exceed 48 hours per week, and overtime hours do not normally exceed 12 hours per week. Braun ensures all employees have the legal right to be employed in the UK.

(h) **Remuneration** – Braun shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

4. Compliance with the policy

4.1 You must ensure that you read, understand and comply with this policy.

4.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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

4.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains breaches the Minimum Standards, or constitutes any of the various forms of modern slavery, raise it with your line manager or company director.

4.7 We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion of a breach of the Minimum Standards or 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.

4.8 If you 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, raise it with your line manager or company Director.

4.9 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.

4.10 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

4.11 If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

5. Communication & Awareness of this policy

5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriated thereafter.

6. Breaches of this policy

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed



Jamie Shepherd
Managing Director
20th July 2022