

Anti-Slavery Policy



Modern slavery is a crime and a violation of fundamental human rights. It takes many 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.

EP Consulting is committed to running our business responsibly and to the highest ethical standards. We have a zero-tolerance approach to modern slavery and human trafficking, and our policy prohibits all forms of forced or compulsory labour. 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 in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

EP Consulting requires its vendors/suppliers to maintain and promote fundamental human rights, where employment decisions are based on free choice without any coerced or prison labour, no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.

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

Policy Responsibilities

EP Consulting is ultimately responsible for ensuring that this policy conforms with our legal and ethical commitments, as well as that all people under our control abide by it.

EP Consulting is responsible for implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal processes to ensure they are successful in combating modern slavery.

Managers are responsible for ensuring that people reporting to them understand and comply with this policy, as well as ensuring they receive appropriate and ongoing training on it and the subject of modern slavery in supply chains.

Feedback and suggestions for the improvement of this policy are welcomed. Any comments, suggestions or queries are encouraged and should be addressed to the Directors.

Policy Compliance

You must read, understand, and enforce this policy. The prevention, identification, and reporting of modern slavery in any element of our company or supply chains is the duty of everyone who works for us or is under our authority. You must refrain from engaging in any action that might lead to or imply a violation of this policy.

If you have reason to believe that a conflict with this policy has occurred, is happening, or may occur in the future, please contact your line manager or a business director as soon as possible. You are urged to express concerns about any issue or suspicion of modern slavery in any aspect of our business or any supplier tier's supply chain as soon as possible.

If you have any doubts about whether a specific act, the treatment of employees in general, or their working circumstances inside any tier of our supply chains represents any of the numerous types of modern slavery, please contact your line manager or a company director.

We want to promote transparency and will assist anybody who expresses serious concerns in good faith under this policy, even if those worries turn out to be incorrect. We are dedicated to ensuring that no one experiences any adverse treatment as a result of reporting in good faith their concern that modern slavery in any form is or may be occurring in any section of our own business or in any of our supplier networks.

Dismissal, disciplinary action, threats, or other unfavourable treatment as a result of voicing a concern is considered detrimental treatment. If you suspect you have been subjected to such treatment, you should immediately notify your line manager.

Communication and Awareness

Training on this policy, as well as the threat our company faces from modern slavery in its supply chains, is part of the induction process for all new employees, and updates will be offered through established channels of communication between the company and you. We routinely train and remind our staff (and where appropriate, suppliers) on their obligations under our Code of Conduct policy.

Our zero-tolerance stance to modern slavery must be conveyed to all suppliers, contractors, and business partners from the beginning of our commercial engagement with them and reinforced as needed subsequently.

Policy Breaches

Any employee who violates this policy may face disciplinary action, which might result in dismissal for misconduct. If other persons or organisations working on our behalf violate this policy, we reserve the right to terminate our relationship with them with immediate effect.

To date, we are not aware of any instances of slavery and human trafficking in our business or supply chain. In the event a report is received, we will act immediately and resolutely. This can

include working with suppliers to remedy any breaches, but also instantly terminating contracts, reporting to law enforcement and other bodies as appropriate.

This statement (made on behalf of EP Consulting in the United Kingdom) on slavery and human trafficking is made pursuant to section 54 Modern Slavery Act 2015.

Review and Revision

EP Consulting will review and update this policy annually to ensure its effectiveness and relevance.

Last Reviewed: January 2025

By: Robert Pitchford, Director

A handwritten signature in black ink, appearing to read 'R Pitchford', is written over a horizontal line.