

# Modern Slavery and Human Trafficking Policy

## Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery.

Every company is at risk of being involved in this crime through its own operations and its supply chain.

At LRWA, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

This Policy applies all Direct Contacts with LRWA including and not exclusive of; members, people going through training, freelancers working on behalf of LRWA, directors and board members.

## Our Business and Supply Chains

LRWA establish a relationship of trust and integrity with all our direct contacts, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

## Policy

LRWA operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all direct contacts, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages direct contacts to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of direct contacts conduct and ethical behaviour

### Due Diligence

LRWA conducts due diligence on all new members during on-boarding and on existing suppliers at regular intervals. This includes:

- Requiring improvements to substandard practices
- Sanctioning suppliers and direct contacts that fail to improve their performance in line with our requirements

We require all direct contacts to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their direct contacts work voluntarily
- They don't require direct contacts to post a deposit/bond and don't withhold payment for any reasons

### Reporting

All direct contacts must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.

LRWA also requires all those receiving LRWA funds or representing the LRWA to report to any suspected or actual instances of fraud, bribery or corruption involving LRWA assets or direct contacts.

LRWA will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded.

LRWA will fully meet its obligations to report fraud, bribery and corruption to third parties. The Fraud Response Plan sets out: the parties that suspected or actual fraud, bribery or corruption must be reported to; the nature and timing of the disclosure required; and who is responsible for making the report.

### Definitions

Fraud is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.

Bribery is giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward someone for having already done so.

A facilitation payment is a type of bribe. An example is an unofficial payment or other advantage given to a public official to undertake or speed up the performance of normal duties.

Corruption is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behaviour by those in positions of power, such as managers or government officials. It would include offering, giving and receiving bribes to influence the actions of someone in a position of power or influence, and the diversion of funds for private gain.

A conflict of interest is where an individual has private interests that may or does influence the decisions that they make as a direct contact or representative of an organisation.