



# Anti-Slavery Policy

Authorised by:

A handwritten signature in black ink, appearing to read "AS Thomis".

AS Thomis  
**Chief Executive**

## 1. Introduction

Cohort plc and its subsidiaries (the **Group**) are committed to high standards of ethical conduct.

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 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.

The Board of Cohort plc intends fully to comply with the Modern Slavery Act 2015 (the **Act**) and believes that the sentiment of the Act is already an integral part of the ethical culture within the Group.

As part of the broader ethical conduct expected, the Group shall take measures to ensure that slavery and human trafficking, as defined by the Act (**Modern Slavery**), are not taking place within our businesses or in our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and 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, whether adults or children, 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, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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 Board has overall responsibility for this policy.
- 2.2. The Managing Director of each business is directly responsible for compliance with this Policy within their business.
- 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

### 3. Subsidiary Reporting

3.1. To ensure that the Group maintains its high standards of ethical conduct vis-à-vis Modern Slavery, each subsidiary is required to produce an annual report to the Board which covers the following:

- a summary of the steps undertaken as part of the review of slavery risk in the business and supply chains;
- a summary of the key risks identified by the risk review and the actions taken to mitigate those risks; and
- a statement on how effective the due diligence and risk mitigation steps are in ensuring that Modern Slavery is not taking place in the business or supply chains.

3.2. The annual report must be provided to the Cohort Chief Executive by close of business on the final working day every May (or such other time as requested by the Cohort Chief Executive) which must report on the above points for the financial year just ended.

### 4. Due Diligence

**4.1. Each Cohort business must undertake the following due diligence on their supply chains to identify whether Modern Slavery is taking or that there is a risk that it may take place:**

**Step 1: List existing suppliers and identify those** that supplied goods and / or services with a value greater than £250k in the financial year just ended (**Material Suppliers**).

**Step 2: Undertake a two-fold assessment of each of the Material Suppliers on the risk of Modern Slavery.** The following criteria should form the basis of the assessment:

- 1) identify the country or countries in which each of the Material Suppliers manufactures and/or produces goods and/or supplies services and ascertain the prevalence of Modern Slavery in those countries<sup>1</sup>; and
- 2) state which industry sector<sup>2</sup> each of the Material Suppliers operates in.

Material Suppliers that pose the highest risk to Cohort (**High Risk Suppliers**) will be those that operate in at least one country with more than 0.5% of its population in Modern Slavery and which operate in one of the following industries: Agriculture, Construction, Food, Hospitality, Manufacturing, Metals and Mining, Retail, and Water.

**Step 3: A letter must be sent by the Managing Directors to all High Risk Suppliers** providing a summary of the Act and what is expected of them (a template letter will be

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<sup>1</sup> Using the latest edition of the Global Slavery Index (<http://www.globalslaveryindex.org/>).

<sup>2</sup> Industry Sectors: Aerospace and Defence, Agriculture, Chemical, Computer, Construction, Energy, Entertainment and Media, Financial Services, Food, Health care, Hospitality, Information, Manufacturing, Metals and Mining, Retail, Telecommunications, Water.

provided by Cohort Executive). The letter shall also request each High Risk Supplier to confirm what steps, if any, they have taken to ensure that the suppliers involved in Cohort-relevant supply chains are not involved with Modern Slavery and to provide evidence of this.

If no steps have been taken by a High Risk Supplier, they should be requested to carry out proportionate steps and provide a report on their findings within 12 months of the request.

#### **4.2. Record Keeping**

A record of all steps undertaken in accordance with this Policy should be kept.

#### **4.3. Transition Period**

Where the response of any High Risk Supplier raises sufficient doubt as to their practices, each Cohort business shall, where practicable, agree an improvement plan with the Supplier. If such Supplier does not comply with the policy within six months of the issue being raised, where practicable, the subsidiary should cease placing orders with this supplier within a period of not more than a further six months.

### **5. Subsidiary Measures**

5.1. In addition to due diligence, each Cohort business must ensure that:

- all new contracts with suppliers to include anti-slavery clauses in the terms and conditions of purchase, including a requirement to take measures to ensure that none of their suppliers are involved with Modern Slavery;
- all existing terms and conditions of purchase to be updated with anti-slavery clauses at renewal of the contract;
- all employment contracts and service agreements with contractors and agents to be amended to include anti-slavery clauses;
- supplier policies are reviewed to ensure that anti-slavery is explicitly referred to and then regularly reviewed thereafter; and
- supplier approval forms are updated to include a section on compliance with the principles set out in the Act.

5.2. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

### **6. Publishing the Statement**

As required by the Act, Cohort plc shall publish a statement (the **Statement**) on its website within six months of each financial year end. The Statement shall be published in the public documents section of the Cohort plc website, with a link to the Statement on the homepage.

The Board of Cohort plc shall review and, if thought fit, approve the Statement for uploading to the website and shall be included within the Corporate Governance section of the Cohort plc Annual Report (unless practice or legislation dictate otherwise).

Each Cohort business shall also publish the Statement on their own websites, on the same day that the Statement is published on the Cohort website. Prior subsidiary Board approval shall be required.

## 7. Speaking Up

Any Group employee who becomes aware of behaviour that is in breach of this Policy should bring it immediately to the attention of their line manager, the Company Secretary, or use the Safecall confidential reporting service, the number for which is displayed in all Group premises.

All policies and management directives within the Group shall be consistent with this Policy.

**Andrew S Thomis**  
**Chief Executive**

Date of issue: 15 September 2020

## Change History

Version	Date	Comments
1.0	April 2016	Initial issue
2.0	September 2020	Update to definition of slavery; clarity regarding responsibility; addition of improvement plan. Other minor changes.