



## Modern Slavery and Human Trafficking Policy

### 1. Purpose

This policy outlines Roman Ltd's commitment to identifying, preventing, and mitigating risks of modern slavery, human trafficking, and forced and involuntary prison labour within our operations and supply chain.

### 2. Scope

This policy applies to all employees, contractors, suppliers, and partners of Roman Ltd worldwide.

### 3. Definitions

- **Modern Slavery:** Practices such as slavery, servitude, forced and compulsory labour, and human trafficking.
- **Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of persons by means of threat, force, coercion, abduction, fraud, deception, or abuse of power for the purpose of exploitation.
- **Forced Labour:** Work or service exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- **Involuntary Prison Labour:** Labour performed by prison inmates that is not conducted on a voluntary basis and is extracted under the threat of penalty.

### 4. Policy Statement

Roman Ltd is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We uphold human rights as set out in international standards and national laws, including but not limited to the Universal Declaration of Human Rights and the UK Modern Slavery Act 2015.

### 5. Responsibilities

- **Senior Management:** Ensuring that policies and procedures to combat modern slavery and human trafficking are in place and enforced.
- **Human Resources:** Implementing training and awareness programs for employees and ensuring safe and fair recruitment practices.
- **Procurement Department:** Conducting due diligence on suppliers and partners to identify and mitigate risks of modern slavery and forced labor.
- **Employees:** Reporting any concerns related to modern slavery or human trafficking in accordance with the company's reporting procedures.

### 6. Due Diligence

We undertake thorough due diligence when considering new suppliers and regularly review our existing suppliers. Our due diligence and reviews include:

- Assessing risks of modern slavery and human trafficking in our supply chains.
- Auditing suppliers' labor practices and their compliance with our policy.

- Requiring suppliers to certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

## 7. Training and Awareness

We provide training to ensure that employees and management are aware of the risks of modern slavery and human trafficking in our business and supply chains. This includes:

- Specialised training for staff involved in procurement and supply chain management.

## 8. Reporting and Compliance

Employees are encouraged to report any concerns regarding modern slavery or human trafficking without fear of retaliation. Concerns can be reported through multiple channels:-

- **Internal Suggestion Box:** Suggestion boxes are located across multiple departments on site. Confidential reports can be submitted by completing the Whistleblowing report form and posting the form to the secured box. HR / Senior management will be granted access for the purpose of review and feedback for documentation received.
- **External Email:** <https://protect-advice.org.uk/contact-protect-advice-line/>

Protect Advice.org, previously known as Public Concern at work, is a UK-based charity focused on promoting and protecting whistleblowing. It provides free, confidential advice to employees and other stakeholders who are concerned about wrongdoing in the workplace. The organization aims to ensure that individuals feel safe to raise concerns about malpractice without fear of retaliation.

All reports will be investigated, and appropriate actions will be taken.

For further details please review the company "Whistleblowing Policy" which can be located on the U drive.

## 9. Monitoring and Review

This policy will be reviewed annually by the Senior Management team to ensure its effectiveness. Changes and updates will be communicated to all employees and stakeholders.

## 10. Conclusion

Roman Ltd is dedicated to combating modern slavery and human trafficking. We strive to act ethically and with integrity in all our business dealings and relationships, ensuring effective systems and controls are in place to safeguard against any form of modern slavery within our business and supply chains.