

MODERN SLAVERY POLICY

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It incorporates practices such as labour exploitation, forced labour, human trafficking, debt bondage, passport holding, and other similar breaches of an individual's basic human rights. At Goldenfry we are committed to ensuring that modern slavery and labour exploitation do not occur in our own business or in our supply chain.

We are also committed to ensuring transparency in our business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.

What steps do we take to ensure that modern slavery and labour exploitation practices are not present in our workforce?

Each employee is required to attend a Company induction on their first day of employment. This meeting is private and usually takes place on a one-to-one basis. At this meeting they must produce an original and valid passport or other identity document to prove their identity. Documents are checked by a manager or member of Human Resources to ensure that:

- a) They appear genuine
- b) They appear to match the individual in front of them
- c) Details across documents match (i.e. date of birth, spelling of name etc)
- d) The new employee has the right to work in the UK

At induction we also go through the employee's individual contract of employment with them and ensure that they understand their terms and conditions of employment and check that they have accessed and read the Employee Handbook. Employees also provide their own bank details at this meeting.

This process is updated regularly to ensure compliance.

What are my responsibilities as an employee of Goldenfry?

When you join Goldenfry you will be asked to read our Employee Handbook as part of your induction process. You are responsible for ethical business practice and working to avoid unfair and discriminatory practices at all times. You should report any practices amounting to modern slavery or labour exploitation as set out above using the Company's Whistleblowing Policy.

When recruiting new members of staff to Goldenfry, Human Resources and management follow our recruitment procedure.

Our recruitment principles are:

- A range of media is used when advertising to attract a diverse workforce
- There is a fair application process which protects applicants from direct or indirect discrimination
- Policy & procedure training is given to those involved in recruitment & selection
- Job analysis is carried out as a basis for job descriptions and person specifications
- Competency-based assessment against selection criteria is used
- A record of applicants is kept including reasons for appointment or rejection
- Offers are subject to Suitability for Employment Checks

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The Suitability for Employment checks include:-

- DBS Disclosure (Basic) if appropriate
- At least one references (covering the last employment) if appropriate
- Right to work in the UK check
- Medical Health questionnaire or assessment
- Qualifications check (if applicable)
- Driver's Licence and Insurance check (if you are required to drive for work purposes)

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

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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.

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

What are the organisation's responsibilities to all its suppliers?

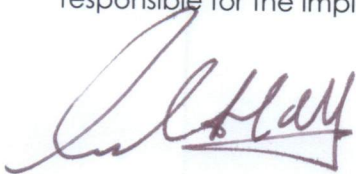
We ensure that all our suppliers can demonstrate that their business practices take every precaution to avoid labour exploitation and modern slavery as set out in the definition above. This includes:

- Checking the identity of workers and staff within your business
- Ensuring workers and staff are not subject to unlawful deductions and fees from their wages
- Ensure workers and staff are in possession of their own legal documents, bank accounts etc.
- Monitoring and auditing your own supply chain to ensure that it is free from modern slavery and labour exploitation practices.

If our suppliers fail to conduct the requirements above this may affect the way in which we work with that business in the future.

If I have any questions about this statement, who should I speak to?

You are invited to comment on this policy and suggest ways in which it might be improved. Comments or suggestions should be forwarded in writing to the General Manager who is responsible for the implementation of this policy.



Guy Hall
 General Manager

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