

# Grace Overseas Ltd, Modern Slavery and Anti-Trafficking Policy

Effective Date: 10/10/2021

## 1. Purpose

Grace Overseas Ltd recognises its responsibility to address and prevent modern slavery, human trafficking, forced labour, and exploitation within our operations and supply chains. This policy outlines our approach, ensuring compliance with relevant legislation and reflecting our commitment to uphold human rights and ethical business practices.

## 2. Scope

This policy applies to all employees, contractors, suppliers, and business partners involved in Grace Overseas Ltd's activities. It extends to all operations, both within the UK and internationally, covering every part of our supply chain and business partnerships.

## 3. Our Commitment

Grace Overseas Ltd strictly prohibits any form of slavery, servitude, human trafficking, or forced labour as defined under:

- **The UK Modern Slavery Act 2015:** Outlines the legal requirements for organisations to prevent modern slavery in operations and supply chains.
- **ILO Forced Labour Convention (No. 29) and Abolition of Forced Labour Convention (No. 105):** Establish international standards on preventing forced labour.
- **UN Universal Declaration of Human Rights:** Affirms the right to freedom from slavery and servitude.

We are dedicated to ensuring that our business, as well as our supply chain, are free from modern slavery practices. This commitment includes transparency, accountability, and regular monitoring to mitigate risks associated with modern slavery.

## 4. Due Diligence and Risk Assessment

Grace Overseas Ltd undertakes proactive due diligence procedures to detect, evaluate, and address any potential risks related to modern slavery within our business and supply chains. Key actions include:

- **Risk Assessments:** Conducting regular risk assessments to identify any vulnerabilities in our operations, both in the UK and internationally.
- **Supplier Audits:** Only partnering with suppliers who share our commitment to ethical practices, subject to regular evaluations to ensure compliance.
- **Contractual Clauses:** Embedding anti-slavery clauses in our contracts with suppliers and business partners, requiring adherence to ethical standards.

## 5. Employee Awareness and Training

To ensure all employees understand the risks associated with modern slavery and their role in identifying and preventing such practices, we provide:

- **Mandatory Training:** All staff receive training on modern slavery awareness, recognising indicators of trafficking and forced labour, and understanding reporting mechanisms.
- **Managerial Guidance:** Supervisors and managers are provided with additional resources to recognise and address potential issues within their teams or departments.

## 6. Reporting and Whistleblowing Mechanisms

Grace Overseas Ltd promotes a transparent environment where employees, suppliers, and partners can report concerns confidentially. Reporting mechanisms include:

- **Whistleblowing Policy:** Employees and other stakeholders can raise concerns regarding modern slavery via confidential reporting channels, in line with our Whistleblowing Policy, which is compliant with the Public Interest Disclosure Act 1998.
- **Anonymous Reporting:** Concerns can be reported anonymously, ensuring protection against any form of retaliation for those reporting in good faith.

All reported incidents are thoroughly investigated, with actions taken to resolve any identified issues, in compliance with the Modern Slavery Act 2015.

## 7. Monitoring and Continuous Improvement

Grace Overseas Ltd is committed to regularly reviewing and improving our approach to modern slavery prevention, ensuring alignment with legislative changes and best practices. This includes:

- **Policy Review:** This policy is reviewed annually or upon significant changes to legislation.
- **Supplier Engagement:** We work with suppliers to build capacity for ethical compliance, encouraging self-monitoring and continuous improvement in alignment with our standards.
- **Management Accountability:** Senior management is responsible for ensuring policy compliance, with oversight provided by our Board of Directors.

## 8. Legal Compliance

Grace Overseas Ltd complies fully with the requirements of the **Modern Slavery Act 2015** and any other applicable laws or regulations concerning modern slavery. We expect our partners and suppliers to comply with these laws and to support our efforts to prevent human rights abuses throughout our business network.

---

**Approved by:** Sarah Taylor

**Position:** Managing Director, Grace Overseas Ltd

**Date:** 04/10/2024