

ESM Modern Slavery Policy

Exhibition Stands Manufacturers Ltd (t/a ESM) maintains relationships with numerous organisations in its supply chain, as well as employing people directly. In light of general employment and human rights laws, and specifically the Modern Slavery Act 2015, we have reviewed our compliance and risk management processes to determine the extent to which measures already exist and what further measures may be required to prevent slavery and human trafficking within our businesses or supply chain. The policy below underpins our approach and will be used to inform our Statement on Slavery and Human Trafficking.

ESM has adopted a statement on the prevention of modern slavery and human trafficking. This statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with ESM and/or any member of our company to familiarise themselves with our anti-slavery values and to act consistently with our anti-slavery policy at all times.

1. Policy Statement

1.1 ESM operates according to a set of values that reflect our behaviours. Regarding the Modern Slavery Act 2015, we are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand this of all who work for us and expect it of all with whom we have business dealings. Our attitude toward modern slavery is one of zero tolerance.

2. Purpose of the Policy

2.1 Modern slavery is a criminal offense under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. This document sets out the policy of ESM (the “Company”) with the aim of preventing opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

2.2 As a company, we have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.

3. Steps for the Prevention of Modern Slavery

- 3.1 We are committed to ensuring transparency in our business and our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners. We are continually evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their suppliers to the same high standards.
- 3.2 All team members must familiarise themselves with our procedures to help identify and prevent modern slavery and conduct business to prevent its occurrence. Adherence to this policy forms part of all team members' obligations under their contracts of employment. While recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking are not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain.

4. Responsibility for the Policy

- 4.1 Ultimate responsibility for the prevention of modern slavery rests with the Directors of ESM. The Directors have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 4.2 Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate guidance on the issue of modern slavery.

5. Actions to Report Modern Slavery or Human Trafficking

- 5.1 The Company's Whistleblowing Procedure provides guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the Employee Handbook. The nature of the complaint will determine the Company's next course of action.

6. Suspicious Activity

- 6.1 Employees or any other person wishing to raise a concern should notify a director in any of the following circumstances:
- 6.2 You suspect a person acting on behalf of ESM is seeking to exploit another in a way that could amount to modern slavery.

- 6.3 You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way that could amount to modern slavery.
- 6.4 You have received an approach from a person acting on behalf of ESM who has invited you to participate in acts that could result in offenses under the Modern Slavery Act 2015 being committed.
- 6.5 You have information that leads to the rational conclusion that a person acting on behalf of ESM or a supplier is preparing to commit, is committing, or has committed an act in contravention of the Modern Slavery Act 2015.

The source of reports will be kept confidential, except where maintaining secrecy or anonymity is not permitted by law or is inconsistent with maintaining adequate procedures to prevent modern slavery in our business or supply chain.

7. Direct Communication

- 7.1 The Company encourages members of the public or persons not employed by us to write, in confidence, to the Managing Director, Exhibition Stands Manufacturers Ltd, Unit 14A, Upper Field Road, Eurolink Industrial Estate, Sittingbourne, Kent, ME10 3UP, to raise any concern, issue, or suspicion of modern slavery in any part of our business or related supply chain.

8. Safeguards

- 8.1 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, anonymity can render investigations and validation more difficult and make the process less effective. Individuals are encouraged to put their names to allegations. Any claims or allegations made that are found to be malicious or vexatious will result in disciplinary action against the individual.

9. Communication and Awareness of this Policy

- 9.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

10. Review

- 10.1 Following its initial adoption, this Modern Slavery Policy will be reviewed regularly and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking.

Signed:



Name: Rob Brackstone

Position: Director

Date: 8th July 2024

Review Date: July 2025