



# MODERN SLAVERY POLICY

## 1. PURPOSE OF POLICY

- 1.1. Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery'.
- 1.2. Any criminal activity that deprives victims of their liberty, including financial and/or other forms of commercial and personal exploitation, is classed as Modern Slavery.
- 1.3. We are committed to the prevention of all forms of Modern Slavery in our business and throughout our supply chains.
- 1.4. You must read and comply with this policy if you work for or on behalf of Cluster in any capacity, including as an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- 1.5. Failure to comply with this policy may result in disciplinary action, including dismissal, or the termination of your contract with Cluster.
- 1.6. If you are an employee, this policy does not form part of your contract of employment and we may update it at any time.

## 2. PREVENTING MODERN SLAVERY

- 2.1. We carry out appropriate checks on all employees, recruitment agencies and suppliers, to ensure we know who is working for us or on our behalf.
- 2.2. Every employee receives a written employment contract and are paid in accordance with the law.
- 2.3. We comply with the law to ensure the health and safety of all our employees and workers.
- 2.4. We comply with the law in relation to working hours, rest breaks and holidays.

## 3. SUPPLIERS

- 3.1. If you supply us with goods or services, you must assess your business and supply chains to ensure that you: Comply with your legal obligations in relation to Modern Slavery, and are committed to preventing Modern Slavery in your business or throughout your supply chains.
- 3.2. If you breach this policy or are found to have Modern Slavery in your business or supply chains, we may terminate our relationship with you.



## **4. EMPLOYEES AND WORKERS**

**4.1.** You must report any suspicions of Modern Slavery in our business or supply chains to the HR department immediately.

**4.2.** We will investigate and report the incident, including any actions to be taken, to our Board of Directors within a reasonable time-frame.

**4.3.** You will not suffer any detrimental treatment as a result of reporting any genuine concerns in good faith under this policy.

**4.4.** The above (4.3) applies even if the report is found to be made in error after investigation.

**4.5.** If you believe that you have suffered mistreatment, you should immediately inform the HR department in accordance with our Grievance and Whistleblowing Policies if you are an employee.