



## Anti-Slavery and Human Trafficking Policy

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### Introduction

This document forms the second iteration of the Anti-Slavery and Human Trafficking Policy as outlined and practiced by Panaz Ltd. Modern slavery is a crime and a violation of fundamental human rights; a violation becoming increasingly prevalent across the globe. Modern slavery can take various forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty.

We recognise our responsibility to prevent, mitigate, and remediate (where necessary) the risks of human trafficking, forced, bonded, and child labour, and to respect human rights in our operations and our supply chains. In this regard, we have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, with a duty to implement effective systems and processes to ensure everyone across our business and supply chains is treated fairly.

As our business and our industry continues to develop, we will continue to review and improve our practices to ensure our efforts to prevent and remediate any negative impact on human rights remain effective.

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**All forms of slavery are illegal.**

### Our Business

Panaz Ltd is a textile design and manufacturing company specialising in the supply of flame-retardant drapery and upholstery materials for the international contract market. Our commitment to our clients, partners and stakeholders is clear; to produce and supply high-quality products and services, complying with all safety regulations and ethical trading requirements. To help us achieve this, we take necessary steps to ensure

our compliance with both employment and human rights legislation, and where practicable, we encourage our key suppliers to do the same.

Panaz Ltd is Headquartered in Burnley, Lancashire (UK).

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## Governance

The Panaz Ltd Board of Directors retain overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries relating to the policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it, including establishing an understanding of the issue of modern slavery in supply chains amongst our employees.

Employees are responsible for ensuring they read and understand this policy, and are invited to comment on its content and structure and suggest ways in which it might be improved. Likewise, all persons associated with the company are expected to take necessary actions to prevent, detect, and report an instance of modern slavery in any part of our business or supply chains. All are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage so that mitigating action may be taken. In return, we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken, and we are committed to ensuring no one suffers any detrimental treatment as a result of making such a report in good faith.

## Training and Policy Education

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. The training aims to help our employees identify and report the signs of forced labour and worker exploitation, encouraging them to report where a colleague may be showing signs of injury or malnourishment.

The Ethical Trading Initiative Base Code is published and displayed around the business premises, and our ISO and SMETA audits span across multiple departments, ensuring full awareness of such standards amongst our teams.

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

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## Policy Applications

This policy applies to all persons directly employed by Panaz Ltd, or acting on behalf of the company in any capacity. It is applicable to employees at all levels, including directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

## Contracts with External Business Partners

We remain committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and business partners. A contractor's failure to comply with modern slavery and human trafficking laws will result in a requirement to put in place the remedial action to achieve compliance, or the cessation of the contract between the contractor and Panaz Ltd.

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## Risk Management

Our approach to identifying and assessing modern slavery risk is embedded within our collective risk management practices. Businesses and functions governed by this policy are contractually required to conform to our control requirements, including active diligence in the identification and notification of modern slavery risks. Our supply chain partners are additionally contractually obligated to mitigate modern slavery risks with their supply chain partners.

We have considered the exposure of Panaz Ltd to modern slavery risk, taking into account the nature of our business activities, the application of group policies, and particularly in our purchasing and recruitment practices. Overall, given the partnerships we have made and the processes that shape our operations, we consider the company's exposure to modern slavery to be low.

## Assessing and addressing modern slavery risk in our supply chain

The management of modern slavery risk and impact in our supply chain is embedded into our Supplier Assessment Framework. We assess the modern slavery risk to people in our supply chain by considering the country of origin we are sourcing products and raw materials from. Through stringent assessment and auditing, our Purchasing and Supply Chain teams develop expert knowledge of local labour laws and human rights risk of potential supply chain partners.

## Assessing and addressing modern slavery risk in our business

Mitigating the risk of modern slavery in our business requires due diligence in our recruitment processes. Supported by our Human Resources team, our management team is responsible for ensuring compliance with local labour laws and is required to only contract formal labour providers with an identifiable legitimate business entity.

All new employees must provide us with their Right to Work documentation before they start their employment with us. We rarely use recruitment agencies, however when we do, they must have provided us with a copy of a UK Government-issued Gangmasters & Labour Abuse Authority Certificate (GLAA).

We recognise that it can be difficult to identify violations of human rights, particularly when there is a perception of a low-level risk of modern slavery in the business. We encourage our managers to speak informally with colleagues to help us understand whether any are experiencing issues that could indicate that they are a victim of modern slavery.

- Right to work checks, passports and visas – the individual is demonstrating that they have access to their legal documentation. It is also common for traffickers to provide fake documents.
- Ensuring the employee's wages are paid into a bank or building society account that matches their name.
- Showing signs of physical or psychological abuse.
- Having insufficient resources or little control over day-to-day items such as clothing, footwear, items for lunch.
- Having limited free movement or being accompanied by someone who could be controlling their every move.
- Being transported to and from work, sometimes as part of a larger group.
- Appearing frightened, withdrawn or confused.

Our Whistleblowing Policy underpins our encouragement for raising questions and concerns related to ethical business practices.

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## Our Policy Statement

The Base Code outlined by the Ethical Trading Initiative (ETI) forms the basis of our working practices with regards to employees and business partnerships. Through all business practices, we seek to build and maintain the highest operating standards, taking practical steps to guard against the exploitation of workers, forced labour, harassment, intimidation, and human trafficking of adults and/or children.

A key part of this involves providing a working environment in which our people can succeed and thrive. In accordance with the ETI base code, this includes:

- Ensuring all employment is freely chosen
  - There is no forced, bonded or involuntary prison labour
  - Workers are free to vacate their role after reasonable notice
  
- Ensuring freedom of association and the right to collective bargaining
  - All workers have the right to join or form trade unions of their own choosing and to bargain collectively, without fear of discrimination
  
- Ensuring safety and hygiene in the workplace
  - We will provide a safe and hygienic working environment, with adequate steps taken to prevent accidents and injury to health
  - All workers will receive regular, recorded health and safety training
  - Responsibility for health and safety is assigned to a senior management representative
  
- Ensuring living wages are paid
  - Wages and benefits paid for a standard working week meet (at a minimum) national legal standards
  - All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment
  - Deductions from wages as a disciplinary measure are not permitted
  
- Ensuring working hours are not excessive
  - Working hours comply with national laws to protect all workers

- Working hours do not exceed 48 hours in any seven-day period unless allowed by national law, with appropriate safeguards in place
- Ensuring no discrimination is practiced
  - Decisions regarding hiring, compensation, access to training, promotion, termination, or retirement are made without discrimination on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation
- Ensuring regular employment is provided
  - To every extent possible, all work performed must be carried out on the basis of a recognised employment relationship, establish through national law and practice
  - Obligations to employees under labour laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment
- Ensuring now harsh or inhumane treatment is given or allowed
  - Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation is prohibited, and any person acting on behalf of Panaz Ltd found to be exhibiting such behaviour will face disciplinary action, up to and including dismissal.

## Child labour and exploitation

Panaz Ltd does not, nor does it intend to, employ any persons under the age of 18.

Should we find that this occurs at any point in our supply chain, the following actions would be taken:

- Collate a list of all potential child labourers and young workers
- Seek advice from recognised local, non-governmental organisations who deal with child labour or the welfare of the child
- Develop a remedial action plan that secures the child's education and protects their economic wellbeing, in consultation with local non-governmental organisations (where possible) and respecting the views of the child

- Explain the legal requirements and restrictions on working ages to the affected child(ren) and assure them that, if they wish, they will be employed by the facility in question when they reach the legal working age for the area
  - Understand the child(ren)'s desires and explore opportunities for them to re-enter education
  - Whether the child contributes to the livelihood of their family or are self-dependent, his or her wage should be continued to be paid by the affected facility until such time as they reach legal working age, or an alternative long-term solution has been agreed with the child and their family (e.g. employment of an unemployed adult family member in place of the child labourer)
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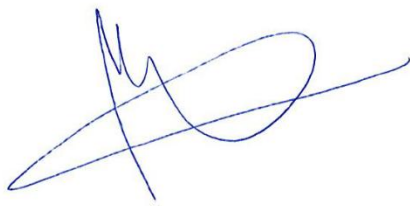
## Next Steps

In the next 12 months, we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chains.

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## Declaration

This policy demonstrates Panaz Ltd's compliance with the Modern Slavery Act 2015. It applies to all subsidiaries of Panaz Ltd and is approved by the Board of Directors.



Rollie Attard (CEO)