EQUALITY AND DIVERSITY POLICY

**MODERN SLAVERY ACT 2015 COMPLIANCE POLICY**

Praybourne Limited trading as PULSAR® is below the level of turnover whereby it would be obliged to produce a slavery and human trafficking statement for each financial year of the Company pursuant to section 54 of The Modern Slavery Act 2015 (The Act). However, the Company wishes to state its commitment to compliance with The Act which by section 1 provides that an offence is committed if a person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude or a person requires another person to perform forced and compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

**Definition of Slavery and Servitude:**

Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Thus, the key element of slavery is behaviour on the part of an offender as if he or she did own the person (even though ownership of a person is legally impossible), which deprives the victim of their freedom; see 1926 Slavery Convention.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another’s property and the impossibility of changing his or her condition.

**Definition of Forced or Compulsory Labour:**

Work or service is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily; see ILO’s Forced Labour Convention 29 and Protocol.

**Definition of Human Trafficking:**

By section 2 of The Act, it is an offence for a person to arrange or facilitate the travel of another person with a view to that other being exploited.

**The Company’s Commitment:**

This policy reinforces the Company’s commitment to the principles stated in its Ethical Trading Policy (POL 003) that in it and its supply chain, employment is freely chosen and that there is no forced, bonded or involuntary labour or human trafficking. It re-states its commitment in the context of its understanding of The Act.

Praybourne Limited trading as PULSAR® will comply with The Act and recognises its moral duty to influence its supply chain towards compliance. The Company expect members of its supply chain to comply with The Act or, where a supply chain member is situated outside the jurisdiction of the courts of England and Wales, to refrain from conduct or practices (proscribed conduct or practices) that would be offences under The Act if it was within the jurisdiction. Where a supplier or members of its supply chain will not comply with The Act, or refrain from proscribed conduct or practices or seek to achieve compliance or abstention from proscribed conduct or practices, Praybourne Limited trading as PULSAR® will not do business with that supplier.

**Due Diligence:**

The Company will risk assess all first-tier suppliers or providers before placing them on its approved list. Risks to be assessed include risk of non-compliance with the Modern Slavery Act, or non-compliance with the spirit of The Act if the Supplier or Provider is outside the jurisdiction.

The Company’s Provider Assessment Procedure contains a risk scoring matrix. Any provider that scores a ‘high’ risk for any aspect of the assessment, including Modern Slavery Compliance, will be asked to provide/carry out a SMETA/SEDEX audit. Following this engagement, the company takes a view as to whether to commission a local audit.

By these assessment processes we seek to ensure that our suppliers and providers are aware of this Modern Slavery Act compliance policy and trained in best practice and standards. We seek to ensure that such awareness exists throughout the supply chain.

**Responsibility:**

The responsibility for the formulation, implementation and review of this policy lies with the;

* Managing Director
* Sustainability/Supply Chain Compliance Manager

However, all members of staff are expected to report any concerns that they have relating to the compliance with The Act and of course they may invoke the Whistleblowing Policy POL 003.

**Actions:**

The Company will be obliged to report to the Authorities any organisation or individual that it reasonably believes is in breach of The Act.

This policy will be reviewed annually as part of the Management Review procedures. All staff are invited to input. Training will be provided within the annual training program. This policy is overviewed by the Managing Director.

**SIGNED:**  **DATED:** 19th April 2024

**Stuart Jukes**

**Managing Director** **REVIEW DATE**: 18th April 2025