

Anti-slavery and human trafficking Policy

This Starris Projects Ltd Policy is approved by the Starris Board; it represents the Starris Board's direction to the business on this topic. Compliance with this policy is mandatory through aligning Starris Projects Ltd Management System processes and people behaviours to the commitments below.

policy statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers. Starris Projects Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Starris Projects Ltd actively supports Human Rights and Equality Legislation. Our ethos is to respect and value people's differences, to help everyone achieve more at work as well as in their personal lives so that they feel proud of the part they play in business success. Our Grievance Procedures ensure sympathetic handling, and hopefully satisfactory resolution, for all aspects of employees concerns or dissatisfaction.

commitments

Modern Slavery and Human Trafficking Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based

approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

additional policy information

All employees and associated persons are required to:

- Comply with the laws and legislations that apply in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

The directorship of Starris Projects fully supports these objectives. We will continually aim to achieve these by the ongoing work of the SIMPLI Caring Committee and Quality Control Working Group who confirm we are meeting or exceeding legal compliance as a business and always looking to continuously improve our processes, procedures and attitudes. We will achieve this by focussing on the following:

Processes: We will ensure our employment process, of both permanent staff and sub-contractors, provides the evidence needed to show all our workers are skilled and professional in their industry, with a right to work in the UK.

Monitor / Review: We will review the Modern Slavery Act 2015 annually to ensure our ongoing compliance.

Andrew Harrison
Managing Director