



## Modern slavery and human trafficking statement

### Introduction

This statement sets out Cygnia's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business or its supply chains.

This statement relates to actions and activities during the financial year ending 31<sup>st</sup> March 2019.

It is Cygnia's policy to conduct its business in an honest, transparent and ethical manner.

Cygnia takes a zero-tolerance approach to modern slavery and human trafficking and all forms of corruption and bribery directly or indirectly associated with these criminal acts, within Cygnia and its supply chains. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Cygnia has published an anti-modern slavery and human trafficking policy which is available to all employees on the company's intranet and website. Our employees are currently undergoing awareness re-fresher training with particular focus on those involved in procurement or with responsibility for supply chain management, in order they can recognise signs of slavery and human trafficking.

Our Anti-Modern Slavery and Human Trafficking policy is reviewed on an annual basis by the board of directors

We have reviewed our contractual arrangements with suppliers as well as our due diligence procedures, to ensure such suppliers are aware they are obliged to comply with the Modern Slavery Act 2015 ('Act'). New and existing suppliers are required by us to provide evidence showing compliance to the Act. We have also incorporated compliance with the Act in our audits of suppliers and partners.

Cygnia employees receive no less than the prescribed minimum wage and we apply robust immigration checks and expect the same standards from our suppliers.

Cygnia's Board has responsibility for ensuring this Statement is appropriately implemented within the business and where required, the appropriate training is provided to employees and suppliers.

### Board Approval

This statement is made pursuant to the section 54 of the Modern Slavery Act 2015 and constitutes Cygnia's Modern Slavery and Human Trafficking Statement for the current financial year.

Signed:

Date:

8 April 2019

Glenn Lindfield  
Chief Executive Officer

## **Anti-slavery and Human Trafficking Policy**

### **POLICY**

- Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of one persons' liberty by another in order to exploit them for personal or commercial gain. At Cygnia we have a zero- tolerance approach to modern slavery and 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 business, or in any of our supply chains.
- We are also committed to ensuring 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 our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers hold their own suppliers to the same high standards.
- This policy applies to all persons working for Cygnia or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives, volunteers and business partners.
- This policy does not form part of any employee's contract of employment and it may be subject to amendments at any time.

### **RESPONSIBILITY FOR THE POLICY**

- The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The QHSE Manager has primary and day-to- day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it 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 and the issue of modern slavery in supply chains.
- You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the QHSE Manager.

### **COMPLIANCE WITH THE POLICY**

- You must ensure you read, understand and comply with this policy.
- The detection, reporting and prevention of modern slavery, in any part of our business or supply chain is the responsibility of us all. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- You must notify your immediate line manager or the QHSE Manager as soon as possible, if you believe or suspect a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or it may occur you must notify your immediate line manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager in the first instance.
- 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 modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the QHSE Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### **COMMUNICATION AND AWARENESS OF THIS POLICY**

- Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us, and training will be provided as necessary.
- 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.

#### **BREACHES OF THIS POLICY**

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**Signed:**

A handwritten signature in black ink, appearing to read 'G. Lindfield'.

**Date:**

8 April 2019

Glenn Lindfield  
Chief Executive Officer