

## **Slavery and Human Trafficking Statement**

Modern Slavery is a term used to encapsulate both human trafficking and offences set out in the Modern Slavery Act 2015, being: slavery, servitude and forced or compulsory labour.

At Primeast we have a zero-tolerance approach to Modern Slavery.

Our slavery and human trafficking statement identifies the steps we have taken to ensure Modern Slavery is not taking place in Primeast or our supply chains.

## **Organisation structure and supply chains**

Primeast provides consultancy, design and training services in relation to leadership, values and culture. We provide these services worldwide and operate in the business to business sector.

Primeast Limited has its head office in Harrogate, United Kingdom and our sister organisation, Primeast LLC, is situated in New Jersey, USA; the two organisations work very closely to provide a high level of service to both our local and multi-national clients. We have a core team of internal designers, facilitators and administrative staff and are supported by a strong network of external associated facilitators.

We have considered the make up and complexity of our supply chains, which we believe to be relatively low risk; our key suppliers are our associates whom, in the majority of cases, are individuals who we contract with directly and build long-term relationships, gaining a better understanding of their operations and policies.

## **Policies in relation to slavery and human trafficking**

In accordance with the UN's Guiding Principles on Business and Human Rights it is the policy of Primeast to respect human rights by:

- Avoiding causing or contributing to adverse human rights impacts through our business activities, and addressing such impacts should they occur, and;
- Seeking to prevent or mitigate adverse human rights impacts linked to our operations and services through our business relationships, even if we have not directly contributed to those impacts.

In addition we make the following specific provisions to:

- Adhere to local and national laws
- Allow freedom of workers to terminate employment
- Allow freedom of movement
- Allow freedom of association
- Prohibit any threat of violence, harassment and intimidation
- Prohibit the use of worker-paid recruitment fees
- Prohibit compulsory overtime
- Prohibit child labour

- Prohibit discrimination
- Prohibit confiscation of workers original identification documents
- Provide access to remedy, compensation and justice for victims of modern slavery

We expect the same high standards from all our suppliers and other business partners. This policy applies to all persons working for us, or on our behalf, in any capacity including; employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Employees, suppliers and all business partners are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. Concerns should be addressed to a company director as soon as possible. We 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 that 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.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If, on investigation, a supplier or employee of Primeast is found to be knowingly and actively involved in conducting any acts of Modern Slavery this will be considered Gross Misconduct and the contract will be immediately terminated, if the situation calls for it, the employee/associate will also be reported to the necessary authorities.

Primeast has also established the following other policies which support our stance on Modern Slavery:

- Supplier Code of Conduct
- Recruitment Policy
- Procurement Policy
- Code of Conduct
- Anti-bribery and corruption Policy
- Whistle-blowing procedures

### **Due diligence and risk assessment processes**

The Directors of Primeast are responsible for reviewing the risk of Modern Slavery within our business and supply chain, and ensuring that any risks identified are investigated and remediated, at least annually. The factors considered will be noted and any specific risks identified investigated, followed by any necessary remedial or preventative actions being taken.

In assessing and managing risks The Board will consider:

- Country risks (in relation to where we conduct our operations)
- Sector risks (in relation to both our own business sector and the sectors we work within)
- Transaction risk (which financial institutions we transact with)
- Business partnership risks (in relation to our customer and supplier relationships)

### **Key performance indicators**

Currently, The Board has assessed that Primeast has low risk in relation to Modern Slavery, as such we have not established any key performance indicators to monitor and mitigate any risks. We will monitor our risks levels over time and, if necessary, may introduce targets, such as increased training for staff on modern slavery issues.

### **Training on modern slavery and trafficking**

Training is a fundamental way of raising awareness and ensuring that people understand the importance of Modern Slavery, and what to do if they encounter something that raises concerns.

All Primeast employees are required to read, and sign to confirm that they understand and will comply with our; operational, health and safety and employee manuals at the commencement of their employment, which includes this Slavery and Human Trafficking statement together with many other supporting policies, some of which have been identified above. Any updates and developments to policies are notified to the team during regular employee briefings and additional training provided where required.

Last reviewed and updated (where applicable): 20 February 2024

Signed, on behalf of The Board, by: Gary Edwards, CEO

