



MODERN SLAVERY POLICY

POLICY STATEMENT

Modern slavery, encompassing various forms like servitude, forced labor, and human trafficking, represents a grave violation of human rights and is a criminal offense. At Aladiah Consult, we uphold a zero-tolerance stance towards modern slavery, pledging to conduct our business ethically and transparently. We are dedicated to implementing robust systems and controls to eradicate modern slavery within our operations and supply chain. We hold our contractors, suppliers, and business partners to the same high standards and expect them to uphold prohibitions against forced labor and slavery. This policy applies to all individuals associated with our business, and compliance is mandatory.

RESPONSIBILITY FOR THE POLICY

Responsibility for ensuring compliance with this policy rests with our Procurement Department, with oversight from the Director 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 accountable for ensuring adherence to the policy and providing necessary training to personnel. It is imperative for all employees to understand and comply with this policy, actively participating in the prevention, detection, and reporting of modern slavery. Any concerns regarding potential breaches of the policy should be reported promptly to the relevant authorities.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Procurement Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue of 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 that it may occur you must notify your 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the Procurement Department. 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 that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. 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

Our commitment to combating modern slavery must be communicated to all our stakeholders, and breaches of this policy will result in disciplinary action, including termination of employment or contracts.

Date Reviewed: September 2023

Person responsible for updating this policy: Grace Famuyibo

Next Review Date: September 2024