

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Anti-Slavery and Human Trafficking Policy</h2>	POL002/02/1119
		Last Reviewed: 10/2023
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		Owner: David Hopley

1 Policy Statement

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

Millbank Holdings Ltd has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

Millbank Holdings Ltd expects our contractors, suppliers and other business partners to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. Millbank expect their suppliers to hold these high standards.

This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

2 Scope

This policy applies to all persons working for, or on behalf of Millbank Holdings Ltd, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.

3 Responsibility

The Millbank Holdings Ltd. Board of Directors has overall responsibility for ensuring this policy complies with Millbank's legal and ethical obligations, and that all those under our control comply with it.

The Millbank Holdings Ltd Group Finance Director has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Group Finance Director is also responsible for updating the policy to reflect any changes in legislation.

Management at all levels of Millbank Holdings Ltd are responsible for ensuring those reporting to them understand and comply with this policy, and, are given adequate and regular training on Modern Slavery.

Millbank Holdings Ltd employees are invited to comment on this policy and suggest ways in which it might be improved.

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4 Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

All Millbank Holdings employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

You must notify your line manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. You can also report any suspected breach by following our Whistleblowing Policy and Procedure.

Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage.

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern, seek advice from your line manager immediately.

5 Communication and Awareness of the Policy

The anti-slavery and human trafficking statement is available on the Millbank website.

Modern Slavery training, which includes identifying signs of Modern Slavery and reporting suspicions of Modern Slavery with Millbank Holdings supply chains, forms part of the induction process for employees. Refresher training will also be provided as necessary.

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on-boarded.

6 Breaches of this Policy

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Millbank's Disciplinary procedure. We may terminate our relationship with other employees, suppliers and any other associates working with Millbank Holdings if they breach this policy.

7 Related Documents

7.1 Internal Documents

- POL017 - Whistleblowing Policy
- SOP009 - Whistleblowing Procedure
- HRSOP007 - Disciplinary Procedure

7.2 External Documents

- Modern Slavery Act 2015

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8 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

- Our Financial year runs from October to September with the end of this Financial Year being 30th September 2024
- This policy was reviewed beginning of October 2023 and will be reviewed annually
- Next review scheduled October 2024.

Signed by:

David Hopley

Title: Managing Director

Date: October 2023

Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.