

## **Flynn Limited**

### **ANTI-SLAVERY POLICY**

#### **1. POLICY STATEMENT**

- 1.1 Modern slavery is a crime and a gross 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 a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Flynn Limited has a zero-tolerance approach to modern slavery and we are committed 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.
- 1.3 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, interns, agents, contractors, suppliers or any other people or bodies associated with the business.
- 1.4 This policy does not form part of any employee's contract of employment and may be amended at any time.

#### **2. RESPONSIBILITY FOR THE POLICY**

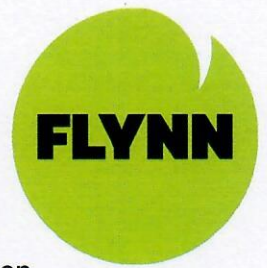
- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Anti-Slavery Compliance Team (the 'Compliance Team') which comprises the Managing Director, HR Advisor and Company Secretary will work together to ensure that this policy is maintained across all operational areas of the Company in accordance with evolving regulatory requirements and to ensure that any breaches or concerns are addressed.
- 2.3 The Managing Director has primary and day-to-day responsibility in relation to our supply chain for implementing this policy and 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.
- 2.4 The HR Advisor has primary and day-to-day responsibility in relation to those directly employed by us for implementing this policy and 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.



### **3. COMPLIANCE WITH THE POLICY**

- 3.1 All persons working for Flynn Limited must ensure that they read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us and/or under our control.
- 3.3 All persons working for Flynn Limited are required to avoid any activity that might lead to, or suggest, a breach of this policy and are strongly encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage, by reporting it in accordance with our Whistleblowing Procedure. All workers are assured that they will not suffer any adverse consequences for reporting genuine concerns over suspected business wrongdoing.
- 3.4 We appreciate that identifying victims of slavery and/or human trafficking may not be obvious and there is no typical 'victim', however, we encourage all persons employed and/or engaged by Flynn to be alive to possible signs that could indicate that someone is being controlled or forced by someone else to provide services as soon as possible. Potential signs include but are not limited to:
  - 3.4.1 The person not being in possession of their own passport, identification or travel documents.
  - 3.4.2 The person acting as though they are being instructed or coached by someone else.
  - 3.4.3 The person allowing others to speak for them when spoken to directly.
  - 3.4.4 The person being dropped off and collected from work.
  - 3.4.5 The person being withdrawn or appearing frightened.
  - 3.4.6 The person not seemingly being able to contact friends or family freely.
  - 3.4.7 The person having limited social interaction or contact with people outside their immediate environment.
- 3.5 Should any person working for Flynn be unsure as to 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, they are encouraged to raise it with a member of the Compliance Team.



- 3.6 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 of our supply chains.

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

- 4.1 This policy will be communicated to all Flynn Limited employees, with training on this policy and the risks potentially faced by Flynn in respect of modern slavery in its supply chains forming part of our induction process for all individuals who work for us.
- 4.2 Flynn Limited employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

#### **5. DUE DILIGENCE**

In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy. These will be kept under review by the Compliance Team.

#### **6. BREACHES OF THIS POLICY**

- 6.1 Any breach of this policy will generally be treated as gross misconduct and may result in dismissal without notice.
- 6.2 We may terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

This policy has been approved the Board of Directors of Flynn Limited

Signed:

Title:

Managing Director

Date:

08.02.21