MODERN SLAVERY POLICY

In accordance with the Modern Slavery Act 2015, we are committed to a work environment that is free from human trafficking[1], forced labour[2] and unlawful child labour[3] (collectively "human trafficking and slavery"). We also strongly believe that we have a responsibility for promoting ethical and lawful employment practices. Accordingly, we will not knowingly use unlawful child labour or forced labour in any of the services we provide, nor will we accept commodities, products and/or services from suppliers that employ or utilise child labour or forced labour.

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement therefore defines our commitment to ensuring that human trafficking and slavery do not exist within our own business and sets out how we will make efforts to eradicate them from other businesses with whom we maintain a relationship and from within our supply chain.

Requirements of businesses and suppliers

All businesses and suppliers we engage with therefore:

- Will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate their workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct were to take place within the UK.

We will ensure that any subcontractors or suppliers from whom they source goods and/or services for incorporation in those supplied to us adhere to these requirements. Upon request, suppliers must be able to demonstrate conformance to this policy. Any breach of this policy (including by a supplier) will be reported to our director. We take any breach of this policy extremely seriously.

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[1] **Human trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
[2] **Forced labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
[3] **Harmful child labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral or social development.

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Responding to concerns
We record concerns about modern slavery or labour exploitation confidentially and refer them promptly to Solfit's directors. We assess immediate risks to workers and consider the risk of retaliation before contacting the supplier. We follow the four-stage procedure in our Ethical Supply Chain Policy (SOL-POL-10) to establish what happened, agree a remedy and verify that it has been delivered.

Breaches of this policy
Personnel or suppliers who are found to have engaged, or to be engaging, in human trafficking and slavery, or who refuse to co-operate with any audit to verify compliance with this policy, will be liable to have any supply agreement, arrangement or other contract with us terminated immediately, without compensation.

	Name	Role	Date	Signature
Approved By:	Ewen Estill	Director	09/11/2026	
Approved By:	Nicola Estill	Director	09/11/2026	

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