P34B Ltd

Business Policies Document

Anti-Slavery and Human Trafficking Policy

Section I

Version P34B-07
July 2025

P34B Limited - Registered office: 8 Market Place, Adlington, Chorley, Lancashire, England PR7 4EZ
Registered in England and Wales No: 8718019. FSB Membership number 51785622. VAT number: 340668009.

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Section I: Anti-Slavery and Human Trafficking Policy

I1.0 - Introduction

P34B Ltd is committed to upholding the highest standards of ethics, integrity, and respect for human rights. This Anti-Slavery and Human Trafficking Policy outlines the Company's commitment to preventing slavery and human trafficking within its operations and supply chains. The Policy applies to all employees, contractors, suppliers, and other business partners associated with P34B Ltd.

We are currently in the process of becoming a national living wage employer, highlighting our commitment to provide meaningful employment for everyone.

I2.0 - Policy Statement

P34B Ltd prohibits any form of slavery, forced labour, human trafficking, or exploitation within its operations. The Company is dedicated to ensuring that neither slavery nor human trafficking takes place in any part of its business activities and supply chains. P34B Ltd expects all employees, contractors, and suppliers to adhere to the principles outlined in this Policy.

I3.0 - Responsibilities

Director Responsibility:

Neil Horner, the Director of P34B Ltd, has overall responsibility for implementing and maintaining this policy. The Director is committed to providing the necessary resources and support to ensure the effectiveness of anti-slavery and anti-human trafficking measures within the Company.

Employee Responsibility:

All employees are expected to familiarise themselves with this policy and actively contribute to its implementation. They should report any suspected cases of slavery, human trafficking, or related activities to their line manager, the Director, or through the Company's designated reporting channels.

Risk Assessment and Due Diligence:

- Supply Chain Due Diligence:
  P34B Ltd recognises that the risk of slavery and human trafficking can extend beyond its own operations to its supply chains. The Company will conduct risk assessments to identify areas of potential vulnerability and take appropriate measures to address and mitigate those risks. This includes implementing due diligence procedures for the selection, evaluation, and monitoring of suppliers and contractors.
- Compliance with Laws and Regulations:
  The Company will comply with all applicable laws and regulations concerning slavery, forced labour, and human trafficking in all areas in which it operates.

Training and Awareness:

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- Employee Training
  P34B Ltd will provide training and educational resources to its employees to ensure they are aware of the risks associated with slavery and human trafficking and understand their responsibilities in preventing such practices.

Whistle-blower Protection:

- Reporting Mechanism
  P34B Ltd encourages all employees, contractors, and stakeholders to report any concerns or suspicions regarding slavery, forced labour, or human trafficking. The Company will establish confidential reporting mechanisms to protect individuals who make such reports.

Review and Continuous Improvement:

- Policy Review
  This Policy will be reviewed annually, to ensure its effectiveness, relevance, and compliance with changes in laws and regulations.

  Continuous Improvement:
- P34B Ltd is committed to continuously improving its practices and procedures to prevent slavery and human trafficking. The Company will consider feedback, conduct audits, and implement necessary changes to enhance the effectiveness of this Policy.

I4.0 - Supply Chain Policy

P34B Ltd acknowledges the potential risk of slavery and human trafficking within its supply chain and is committed to taking proactive measures to prevent such practices. The Company has implemented a documented Supply Chain Policy to ensure that neither slavery nor human trafficking occurs at any stage of its supply chain. The key components of the Supply Chain Policy are as follows:

- Supplier Evaluation and Selection:
  P34B Ltd conducts thorough evaluations of potential suppliers and contractors to assess their compliance with anti-slavery and human trafficking standards. This includes assessing their policies, procedures, and practices related to labour and human rights.

- Supplier Code of Conduct:
  P34B Ltd requires all suppliers and contractors to adhere to its Supplier Code of Conduct, which prohibits slavery, forced labour, and human trafficking. This code sets out the minimum standards expected from suppliers in relation to ethical business practices, labour rights, and human rights.

- Supplier Audits and Monitoring:
  P34B Ltd will conduct audits and monitor activities annually to verify compliance with its Supplier Code of Conduct. These audits may be conducted by internal teams or by third-party auditing organisations, ensuring independent verification of compliance.

- Remediation and Improvement:

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If any supplier or contractor is found to be non-compliant with the Supplier Code of Conduct, P34B Ltd will work with them to develop a corrective action plan. The Company will support and monitor the implementation of necessary improvements and provide guidance to rectify any identified issues.

- Collaboration and Engagement:
  P34B Ltd actively engages with its suppliers and contractors to promote awareness and understanding of the risks associated with slavery and human trafficking. The Company encourages dialogue and collaboration to foster a collective commitment to eradicating these practices from the supply chain.

- Supplier Training:
  P34B Ltd does not currently provide any training and guidance to its suppliers and contractors on their responsibilities to prevent slavery and human trafficking. However, we do recognise best practice is to ensure our supply chain meets the requirements outlined in our supplier code of conduct.

- Continuous Improvement:
  P34B Ltd is committed to continuous improvement in its supply chain practices. The Company regularly reviews and updates its Supply Chain Policy to align with evolving industry standards and best practices in combatting slavery and human trafficking.

By implementing this Supply Chain Policy, P34B Ltd strives to ensure that all suppliers and contractors uphold the same high standards of ethics, integrity, and respect for human rights as we do.

I5.0 - Contact Information

For any questions or concerns regarding this Policy or to report suspected cases of slavery, human trafficking, or related activities, please contact:

Neil Horner

Director, P34B Ltd

Email: neil.horner@p34b.com

This Anti-Slavery and Human Trafficking Policy reflects P34B Ltd.'s commitment to eradicating slavery and human trafficking in all its forms and promoting a responsible and ethical business environment.

I6.0 - Supplier Code of Conduct

I6.1 - Introduction:

P34B Ltd is committed to conducting business ethically, responsibly, and sustainably. We expect our suppliers and business partners to share and uphold these values. This Supplier Code of Conduct outlines the principles and guidelines that govern the behaviour and practices we expect from our suppliers.

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Compliance with Laws and Regulations:

- Suppliers must comply with all applicable laws, regulations, and standards in their business activities.
- This includes but is not limited to labour laws, health and safety regulations, environmental protection, and fair-trade practices.

Labour and Human Rights:

- Suppliers must respect and uphold the fundamental human rights of their employees, including the prohibition of child labour, forced labour, and discrimination.
- Fair and ethical treatment of employees, including reasonable working hours, fair wages, and safe working conditions, is expected.

Ethical Business Practices:

- Suppliers must engage in fair and ethical business practices, including honest and transparent communication, accurate record-keeping, and avoidance of conflicts of interest.
- Bribery, corruption, and any form of unethical behaviour are strictly prohibited.

Environmental Responsibility:

- Suppliers are expected to minimise their environmental impact by adopting environmentally sustainable practices.
- This includes waste reduction, resource conservation, pollution prevention, and adherence to relevant environmental regulations.
- P34B Ltd has achieved Silver Accreditation. We hope our partners, suppliers and clients can support our mission for continuous best practices in creating a sustainable environment for the future.

Supply Chain Responsibility:

- Suppliers should ensure that their own suppliers and subcontractors adhere to similar ethical standards and practices.
- Transparency and accountability throughout the supply chain are encouraged.

Confidentiality and Intellectual Property:

- Suppliers must respect the confidentiality of P34B Ltd.'s information and intellectual property rights.
- Confidential information shared by P34B Ltd should be used solely for the purpose of fulfilling the business relationship and not disclosed to unauthorised parties.

I6.2 - Continuous Improvement:
Suppliers are encouraged to continually assess and improve their practices to align with evolving social, environmental, and ethical standards.
Collaboration with P34B Ltd to identify opportunities for improvement is welcomed.

I6.3 - Consequences of Non-Compliance:
Non-compliance with this Supplier Code of Conduct may result in a reassessment of the business relationship, including potential termination of the supplier agreement.

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I6.4 - Review and Update:
This Supplier Code of Conduct will be reviewed annually to ensure its continued relevance and effectiveness. Any necessary updates will be communicated to suppliers in a timely manner.

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Appendix I1 – Signed Policy and Our Objectives Outlined

APPENDIX I1

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

At P34B Ltd our Anti-Slavery and Human Trafficking policy is to, so far as is reasonably practicable:

- *P34B Ltd is committed to maintaining ethics, integrity, and respect for human rights in all its operations and supply chains.*
- *The policy strictly prohibits any form of slavery, forced labour, human trafficking, or exploitation within the company and its supply chains.*
- *All employees, contractors, and suppliers are expected to be aware of and adhere to the policy. Employees are encouraged to report any suspicions through designated channels.*
- *P34B Ltd will conduct risk assessments to identify potential vulnerabilities in its supply chains and implement due diligence procedures for suppliers and contractors.*
- *The company commits to comply with all applicable laws and regulations concerning slavery and human trafficking in all areas of operation.*
- *Employees will receive training and educational resources to recognise and prevent slavery and human trafficking risks.*
- *Confidential reporting mechanisms will be established to protect individuals who report concerns or suspicions.*
- *Suppliers will be evaluated based on compliance with the Supplier Code of Conduct, which includes labour and human rights, ethical business practices, and environmental responsibility.*
- *P34B Ltd actively engages with suppliers to promote awareness and understanding, fostering a collective commitment to eliminating slavery and human trafficking from the supply chain.*

P34B Ltd will review this policy annually and revise whenever there is a change in circumstances, in work practices or the introduction of new legislation affecting the policy, to ensure that these standards of Equality, Diversity and Inclusion are maintained.

Signed:

Print Name: P34B Ltd

Date: 09th July 2025

Date for next review: 1st August 2026

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