

## BENCHMARK HOLDINGS PLC MODERN SLAVERY POLICY

### INTRODUCTION

1. Benchmark is committed to doing business with integrity and in an ethical manner. This includes a commitment to ensuring that there is no modern slavery in its own operations, and engaging actively with its suppliers to prevent any modern slavery in its supply chains. We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, in line with our disclosure obligations under the Modern Slavery Act 2015.
2. Benchmark aims to ensure that there is no modern slavery in its own operations, or that of its suppliers, by:
  - Setting out a clear policy in relation to modern slavery.
  - Providing employees with training to ensure that they are aware of the nature of modern slavery and the Company's policy in relation to it.
  - Implementing recruitment and people policies designed to ensure that no modern slavery can occur within the Benchmark group.
  - Implementing due diligence procedures, and placing contractual obligations, on its suppliers, to mitigate the risk of modern slavery within our suppliers or in their supply chains.
  - Encouraging employees to be vigilant and report any suspicions of modern slavery.
  - Providing employees with suitable channels of communication, through which concerns can be raised, and ensuring that sensitive information is treated appropriately.
  - Investigating suspicions of modern slavery and ensuring that appropriate action is taken.
3. The Benchmark group operates in many locations globally, and has many suppliers operating in numerous sectors around the world. The diversity, scale and reach of the Group's operations, and that of its suppliers, gives Benchmark an opportunity to positively influence the environment in which many people work. This Modern Slavery Policy is considered an important part of the way in which Benchmark people are expected to conduct business.
4. 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, external consultants, third-party representatives and business partners.
5. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### THE MODERN SLAVERY ACT

6. The UK implemented the Modern Slavery Act in 2015. The act places obligations on companies to ensure that there is no modern slavery in their own operations, and in those of their suppliers.
7. Modern slavery encompasses any form of slavery, servitude, forced 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.
8. A copy of the UK Modern Slavery Act 2015 can be found at: [www.legislation.gov.uk/ukpga/2015/30/contents](http://www.legislation.gov.uk/ukpga/2015/30/contents)

### BENCHMARK'S POLICIES IN RELATION TO MODERN SLAVERY

9. Benchmark operates a structured training programme to ensure that its people are aware of and understand this Modern Slavery Policy.
10. Benchmark's People Policy requires that thorough right to work checks are undertaken before any person is employed in the U.K., and the Company is implementing measures to confirm that it is in full compliance with equivalent rules globally.
11. Benchmark aims to be a better employer, going beyond what is required by law, and pays all of its people at least the living wage, in all countries where a standard living wage is set by the Living Wage Foundation or similar organization. For countries where there is no living wage standard, Benchmark is in the process of implementing a system by which a

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reasonable living wage is determined as a percentage of pay above the minimum wage in that country, having regard to living wage levels in similar countries, and intends to pay all of its people at least that derived living wage.

12. Benchmark prohibits the use of forced or compulsory labour globally. No employee is made to work against their will or work as forced labour (according to the definition of forced labour in accordance with the ILO Forced Labour Convention (No.29) and the Abolition of Forced Labour Convention (no.105)). We employ people under the age of 18 (apprentices, for example) in compliance with local laws and we will not employ children under the age of 16 in line with the prohibition of child labour in accordance with the ILO Minimum Age Convention. Special care must be taken to ensure that young workers receive additional support and extensive health and safety training.
13. Benchmark has introduced a system of diligencing its suppliers designed to verify that there is no modern slavery in its suppliers' operations, and that suppliers are not aware of any modern slavery in their own supply chains. This includes asking the supplier to complete a short compliance questionnaire and seeking contractual undertakings from the supplier.
14. Where the Benchmark group is dealing with suppliers in countries where there is a higher risk of corruption or which are subject to economic sanctions, enhanced due diligence is conducted on the supplier in relation to economic sanctions, serious offences, and serious adverse media and reputational matters. This requirement is operated through the Policy for Operating in Sanctioned Countries.
15. Benchmark maintains a register of its most significant suppliers for all businesses in the group, against which a modern slavery risk assessment is undertaken based on sector, geographical location and other relevant factors. Where appropriate, action will be taken to follow up with the supplier to seek to ensure that no modern slavery is taking place.
16. Benchmark has an employee Code of Conduct, which includes guidance on decision making across the business to help guide its employees to do business in a way that is compliant, with integrity, and to make ethical, responsible decisions.
17. Benchmark operates a Whistleblowing Policy, designed to ensure that its people are able to raise concerns, such as in relation to modern slavery, securely and without fear of reprisals.

## RESPONSIBILITY AND BREACH

18. The Compliance Officer has primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries and auditing internal control systems and procedures to ensure they are effective in combating modern slavery.
19. The prevention of modern slavery is the responsibility of all Benchmark people and those working under our control, particularly those responsible for teams internally and for relationships with suppliers. Any suspicion of modern slavery should be reported to the Compliance Officer at [compliance@bmkholdings.com](mailto:compliance@bmkholdings.com). You must notify the Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
20. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.
21. This Modern Slavery Policy is reviewed annually. Any significant issues arising will be immediately reported to the Board of Benchmark Holdings plc, and other issues arising will be reported to the Board of Benchmark Holdings plc at the next routine Board meeting.

## CONTACT INFORMATION

Compliance Officer: [compliance@bmkholdings.com](mailto:compliance@bmkholdings.com)