

## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

### 1. POLICY STATEMENT

We are committed to acting ethically and with integrity in all our business dealings and relationships, and 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. This policy supports our commitment to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy therefore 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.

### 2. DEFINITIONS

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms which include slavery, servitude, forced or 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.

### 3. SUPPORTING POLICIES

Bloom have several policies which support the organisation to prevent and

mitigate the risk of modern slavery existing in the organisation, and to ensure an open and transparent culture. These include the following policies:

- Whistle-blowing policy, which is in place to ensure there is appropriate protection in place for employees with regards to Whistle-blowing on protected disclosures
- Health and Safety Policy, which forms part of our commitment to ensure our employees have a safe place to work
- Grievance procedure, this policy is in place to ensure we have in place an open and transparent grievance process for all employees

### 4. ADDITIONAL MEASURES

In addition to the above policies, Bloom will ensure that:

- Right to Work documents are checked for all employees

- All employees have a written contract of employment
- All new recruits are provided with information on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to
- The Company is compliant with all government legislation regarding the National Minimum Wage and Equal Pay Act

## 5. RESPONSIBILITY FOR THE POLICY

- The Executive Chairman has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it
- The Director of Operations has primary and day-to-day responsibility for implementing this policy, 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

- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy
- All employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR team

## 6. COMPLIANCE WITH THE POLICY

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 or under our control. You are therefore asked to:

- Avoid any activity that might lead to, or suggest, a breach of this policy

- Notify your manager OR the Director of Operations as soon as possible if you believe or suspect that a conflict with this policy has occurred, or is likely to occur in the foreseeable future
- Raise any concerns about issues or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about 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, raise it with your manager
- Notify your manager or the Director of Operations as soon as possible if you believe or suspect a breach of this policy has occurred, or that it may occur. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and

guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of Operations immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on Breathe HR.

## **7. BREACHES OF THIS POLICY**

Any employee who breaches this policy, including failing to notify an appropriate person about criminal actions of which you are aware, may lead to disciplinary action potentially resulting in dismissal for misconduct or gross misconduct due to a breach of contract.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Please note this policy does not form part of any employee's contract of employment and we may amend it at any time.