

MODERN SLAVERY ACT AND HUMAN TRAFFICKING POLICY

Modern slavery is a crime and a 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.

Dawnus have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all its business dealings and relationships and to implementing systems and controls that are designed to ensure that modern slavery is not taking place anywhere in our own business or across our supply chain.

Dawnus will ensure transparency within its organisation and with suppliers of goods and services to the organisation consistent with disclosure obligations under the Modern Slavery Act 2015.

As part of our contracting processes, we are committed to incorporating controls against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Dawnus expect its supply chain to hold their own supply chain to similar controls. The Dawnus supply chain approval processes will incorporate a review of the controls implemented by the supplying and subcontracting organisations.

Responsibility

The Dawnus Group Board of Directors take responsibility for ensuring this policy complies with the Companies legal and ethical obligations. The Board of Directors are also responsible for ensuring that all those that fall within the scope of the policy comply with it.

Scope

This policy applies to all persons working for Dawnus or on our behalf of the Company in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Compliance

The Company will not knowingly support or deal with any business involved in slavery or human trafficking. The prevention, detection and reporting of modern slavery in any part of Dawnus or its supply chain is the responsibility of all those working for us or under our control.

Employees and personnel working on behalf of Dawnus are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chain of any supplier tier at the earliest possible stage.

Dawnus aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. 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.

Awareness

Training on this policy, and on the risk faced by Dawnus from modern slavery in its supply chain, will form part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Nick Down
Group Managing Director
Dawnus Group Ltd
October 2018