

# MODERN SLAVERY POLICY STATEMENT



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## Policy Statement

Version 1  
December 2023

Dye & Durham Corporation, together with its affiliates, holding and subsidiary companies, (**Dye & Durham**) is committed to preventing modern slavery, forced labour, child labour and any perceived or known human trafficking in its corporate activities, supply chains, and business associations. Dye & Durham is dedicated to curbing modern slavery and does so by implementing and enforcing effective systems and controls to reduce the risk of modern slavery taking place in its own business or its supply chains.

Dye & Durham acknowledges that modern slavery laws have been implemented in some of the jurisdictions where we do business. We will ensure our continued compliance with applicable laws.

This Policy applies to all persons employed by Dye & Durham.

Dye & Durham may amend this Policy at any time.

### RELATED POLICY AND GUIDELINES

This Policy should be read in conjunction with the following Policies:

- Employee Global Handbook
- Code of Business and Ethics Policy
- Whistleblower Policy

Dye & Durham believes its strong set of values guide and define the way in which employees carry themselves in their regular course of work and informs the culture within which our business operates.

### WHAT IS MODERN SLAVERY?

Modern slavery is a serious violation of an individual's dignity and human rights. Exploitative practices, including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage, are all considered modern slavery and are serious crimes.

Modern Slavery takes various forms and includes:

- Slavery: where ownership is exercised over an individual.

- Servitude: involves the obligation to provide service imposed by coercion.
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty; and
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the Act include, but are not limited to:

- Child labour: child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common, the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental rights.

It is important to understand that there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim, namely:

- The person is not in possession of their own passport, identification, or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- The person allows others to speak for them when spoken to directly.
- The person is dropped off and collected from work.
- The person is withdrawn, or they appear frightened.
- The person does not seem to be able to contact friends or family freely; or
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not conclusive or exhaustive. It is an example only. Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it. Refer to the 'Reporting' section below for further detail.

## **DYE & DURHAM'S COMMITMENT TO ANTI SLAVERY**

Dye & Durham is committed to operating our business with regard and commitment to applicable modern slavery laws.

Specifically, Dye & Durham is committed to ensuring our employees understand modern slavery and the risk it presents in our operations and providing our employees with appropriate training and avenues for reporting instances of modern slavery within our operations, or the operations of our business partners.

In pursuit of our commitments, we will ensure that:

- Every effort is made to remain compliant with local, national, and other applicable laws and regulations in the areas in which the business operates.
- Source products and services in accordance with legal obligations and community expectations.
- Make all third-party business partners aware of our Policy and commitment to anti-slavery.
- Inform employees of this Policy and Statement and provide training on this topic; and
- Provide avenues for reporting/disclosing perceived, potential, or actual modern slavery activity.

## RESPONSIBILITY FOR THE POLICY

The Global Chief Legal Officer will designate a senior manager to act as a Modern Slavery Officer, who will have the primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, and dealing with any queries about it. The Modern Slavery Officer's responsibilities extend to:

- Monitoring, consulting, and auditing internal controls and procedures to identify risks of modern slavery practices in Dye & Durham's operations.
- Monitoring and consulting with the suppliers, contractors, and business partners of Dye & Durham to identify risks of modern slavery practices in our supply chains.
- Developing measures to assess and address any risks of modern slavery practices, including through due diligence in Dye & Durham's contractual relations.
- Monitoring the effectiveness of those measures.
- Establishing metrics for assessing the effectiveness of this Policy.
- Recommending revisions to this Policy as necessary to ensure continued legal compliance.
- Developing appropriate training materials and programs for Dye & Durham's employees to comply with this Policy.
- Responding to inquiries from third parties, including governmental agencies, regarding Dye & Durham's efforts to prevent modern slavery; and
- Identifying and satisfying any applicable government reporting obligations.

All those working for Dye & Durham (or under its control) have responsibilities under this Policy regardless of the level of seniority. You must ensure that you read, understand and comply with this



Policy. You are also 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 Modern Slavery Officer.

## REPORTING

The prevention, detection and reporting of modern slavery in any part of Dye & Durham's business or supply chains is the responsibility of all those working for it or under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

All employees, contractors and third-party employees, directors, consultants, and any other third-party business partners are encouraged to report any suspected, potential or actual activity that purports to be promoting modern slavery in any way. Any person who makes a report will not be victimised, however, false and misleading disclosures will be managed in accordance with the Organisation's disciplinary process.

Employees or those external to Dye & Durham can make a disclosure by emailing the Modern Slavery Officer at [whistleblower@dyedurham.com](mailto:whistleblower@dyedurham.com). Reports may be made on an anonymous basis.

Dye & Durham aims 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. Dye & Durham is 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 Dye & Durham's business or in any of its supply chains. Dye & Durham's Whistleblower Policy explains in further detail the protections that are available to anyone who raises a concern under that policy.

## BREACH OF POLICY

Any breach of this Policy will be managed in accordance with the Dye & Durham's Disciplinary Procedures.

Dye & Durham may terminate its relationship with other individuals and organization working on its behalf if they breach this Policy, including for just cause.

## ADDITIONAL REFERENCES

- ***Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023***  
[Fighting Against Forced Labour and Child Labour in Supply Chains Act \(justice.gc.ca\)](#)
- *Modern Slavery Act 2018* (Australian Cth)  
<https://www.legislation.gov.au/Details/C2018A00153>
- *Modern Slavery Act 2015* (UK)  
<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

### Document History and Approvals

Version	Date	Author	Revision Notes	Board Approval
1	December 2023	DLA Piper, Alice Burch and Awele Obiago	Draft and clean up	December 2023