

Modern Slavery Code of Conduct

Purpose

This Code of Conduct outlines our commitment to ensuring that modern slavery and human trafficking have no place in our supply chain. We use this code of conduct to inform our due diligence process when reviewing our suppliers and supply chains at least annually, and during new supplier take on discussions. This aims to ensure the necessary safeguards are in place to help promote ethical labour practices and protect the rights of workers.

Scope

This Code applies to all suppliers, contractors, and business partners of Dundas Partners LLP.

Commitment to Ethical Labour Practices

1. Prohibition of Modern Slavery

Suppliers must not engage in any form of modern slavery, including forced labour, human trafficking, or exploitation of workers.

2. Child Labour

Suppliers must not employ individuals under the legal minimum age as defined by local laws. Suppliers must implement measures to verify the age of their workers.

3. Voluntary Employment

Workers must enter employment voluntarily and have the freedom to leave their employment without coercion or intimidation.

4. Fair Treatment

Suppliers must provide fair wages and benefits in accordance with local laws and industry standards, ensuring that workers are compensated adequately for their work.

Due Diligence and Compliance

5. Risk Assessment

Suppliers are required to conduct regular assessments of their operations and supply chains to identify and address potential risks of modern slavery.

6. Compliance with Laws

Suppliers must comply with all applicable laws and regulations regarding labour and employment in their respective jurisdictions.

The UK's Modern Slavery Act 2015 criminalises modern slavery and human trafficking, and includes measures to protect victims and ensure transparency in supply chains:

- **Criminal offenses**
The act criminalises slavery, servitude, forced labour, and human trafficking. The maximum sentence for these offenses is life imprisonment.
- **Victim protection**
The act includes a statutory defence for victims of slavery or trafficking who are forced to commit certain crimes.
- **Supply chain transparency**
The act requires businesses with a turnover of more than £36 million to publicly report on their efforts to prevent modern slavery in their supply chains.
- **Supplier codes of conduct**
Companies must have a supplier code of conduct that outlines the principles they expect suppliers to uphold. This includes a zero-tolerance policy for forced labour and safe working conditions.
- **Independent Anti-slavery Commissioner**
The act includes an independent Anti-slavery Commissioner.

Worker Rights and Freedom

7. Right to Organise

Workers must have the right to freely choose their representation and engage in collective bargaining.

8. Non-Discrimination

Suppliers must promote an inclusive workplace free from discrimination based on race, gender, religion, nationality, sexual orientation, or any other characteristic.

Reporting Mechanisms

9. Whistleblower Protection

Suppliers must establish confidential reporting mechanisms for workers to report concerns regarding modern slavery or unethical practices without fear of retaliation.

Training and Awareness

10. Employee Training

Suppliers are encouraged to provide training for all employees and management on the prevention of modern slavery and the importance of ethical labour practices.

Monitoring and Accountability

11. Audits and Assessments

Suppliers must allow for regular audits and assessments by Dundas or third parties to ensure compliance with this Code.

12. Corrective Actions

Suppliers are required to take immediate corrective action in cases of non-compliance with this Code.

Commitment to Improvement

13. Continuous Improvement

Suppliers should continuously strive to improve their practices regarding labour rights and the prevention of modern slavery.

14. Associated documents

- Vendor Policy

Change	Version	Date
Original	1.0	October 2024

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