



*Innovation in Vacuum and
Conveying Technology*

Quirepace Ltd
Quirepace House
6 Pennant Park
Fareham, Hampshire
PO16 8XU UK

Tel: +44 (0) 23 9260 3700
admin@quirepace.co.uk
www.quirepace.co.uk

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

for QUIREPACE LTD

7th JUNE 2024 Issue 9

APPROVED & AUTHORISED BY:-

A rectangular box containing a handwritten signature in blue ink, which appears to be "RJ Pescott".

RJ PESCOTT
MANAGING DIRECTOR
Review 6th June 2025

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1.0 POLICY STATEMENT

- 1.1 Quirepace Limited (“the Company”) maintains relationships with many different organisations in its supply chain, as well as supplying varying levels of contract. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what existing measures are undertaken and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or supply chain.
- 1.2 The Company has adopted a statement of our corporate values on the prevention of modern slavery and human trafficking. This value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.
- 1.3 We expect all who have, or seek to have, a business relationship with the Company and/or any member of the Company, to familiarise themselves with, and always act in a way which is consistent with, our anti-slavery values.

2.0 QUIREPACE COMMITMENTS

- 2.1 As part of our culture of good governance for good business, the Company operates to a set of core values, which reflect our relationships with our customers, shareholders, suppliers and staff. We adopt a behavioural value for all our business relationships, reflecting our attitude to avoid the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it from all with whom we have business dealings.

3.0 PURPOSE OF THIS POLICY

- 3.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which deprive an individual of their liberty as other persons exploit them for personal or commercial gain. This document sets out the policy of the Company with the aim of the prevention of opportunities for modern slavery to occur within our business or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- 3.2 The company operates a zero-tolerance approach to modern slavery. 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 within our own business or those of our suppliers.

4.0 STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 4.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business and 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. We expect our customers and suppliers to hold their own suppliers and customers to the same high standards.
- 4.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures: -
 - i) Determine which parts of our business and which of our customers/suppliers are most at risk of modern slavery so that efforts can be focused on those areas.

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- ii) Engage with our customers/suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses. Where appropriate, seek to introduce customer/supplier pre-screening (for example as part of our tender process) and self-reporting for our customers/suppliers on safeguarding controls.
- iii) Introduce contractual provisions for our customers/suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

5.0 RESPONSIBILITY OF MANAGEMENT

- 5.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of Directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.
- 5.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

6.0 ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

- 6.1 Staff Communication Procedure – direct access to senior leadership.

The Company's staff access to the Directors is confidential. Concerns about suspected modern slavery associated with the Company or our customers/suppliers may be reported by employees in this manner.

In summary, a team member should approach a Company Director with the nature of the concern who will determine the Company's next course of action.

- 6.2 Confidential Feedback Line – those who are accessing this policy because they:-

- Are seeking a business relationship with us/our business, or
- Already have a business relationship with us/our business

Are also advised to familiarise themselves with the main features of our measures for combating modern slavery; Suspicious Activity should be reported through our Company telephone line 023 9260 3700 and passed to a Company Director.

This line may be accessed by employees or any other person wishing to raise a concern. You should call in any of the following circumstances: -

- You suspect a person acting on behalf of Quirepace Ltd is seeking to exploit another in a way which could amount to modern slavery.
- You suspect that a person acting on behalf of one of our customers/suppliers is seeking to exploit another in a way which could amount to modern slavery.
- You have received an approach from a person acting on behalf of Quirepace Ltd who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed.
- You have information which leads to the rational conclusion that a person acting on behalf of Quirepace Ltd or customers/suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

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6.3 Direct Communication

The Company encourages members of the public or others not employed by us to email in confidence, to a Company Director at admin@quirepace.co.uk to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

7.0 SAFEGUARDS

- 7.1 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 because 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.
- 7.2 The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made, which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

8.0 COMMUNICATION & AWARENESS OF THIS POLICY

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

9.0 REVIEW

- 9.1 Annually unless circumstances change.