

Landmark Information Group Limited

Anti-Slavery and Human Trafficking Policy

Version 1.0

Effective from Date of Issue

Change Record

Date	Author	Version	Reason
25/02/16	C.Dixon	0.1	Initial Draft
07/06/16	C.Dixon	0.2	Updates
21/6/16	T Adeshile	0.3	Updates
21/6/16	C Dixon	1.0	Final Version

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. INTRODUCTION

This policy concerns the prevention of modern slavery or human trafficking in the work place in accordance with the Modern Slavery Act 2015.

2. SCOPE

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

3. POLICY STATEMENT

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. Landmark has a zero-tolerance approach to modern slavery and 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.

Landmark are also committed to ensuring there is transparency in our own business and 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 of our contractors, suppliers and other business partners, and as part of our contracting processes, we ensure that our contractors have an awareness of our Policy and expectations in this area, and include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards, and will require a copy of their own Anti-Slavery and Human trafficking policy to ensure this compliance.

4. RESPONSIBILITY FOR THE POLICY

The Senior Management Team 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 Senior Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy..

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the

opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

You 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 Senior Compliance Officer.

5. COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this 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 required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the Senior Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue 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 or the Senior Compliance Officer.

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 Senior Compliance Officer immediately.

6. COMMUNICATION AND AWARENESS OF THIS POLICY

Awareness of this policy, and on the risk our business faces from modern slavery in its supply chains, is part of our Integrated Management System documentation. This forms part of the induction process for all individuals who work for us.

7. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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