

# Modern Slavery Policy



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# Document

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# Modern Slavery

## At Zentura

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015 and 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. Businesses must be alert to the risks of modern slavery not only ensuring there are appropriate working conditions within their own business but also satisfying themselves that there is no modern slavery within its supply chain, plus taking appropriate action where necessary.

Zentura Ltd (the "Company") has a zero-tolerance approach to modern slavery of any kind within its business and its supply chains. We seek to enforce this ethos within every aspect of the business, including its supply chains, and will take the necessary steps should any member of staff or any of its suppliers act to the contrary.

Through identifying key risk and adopting measure to combat such, we are confident, as far as possible, that there are and will continue to be sufficient steps in place to discourage and deter modern slavery within its own business and that of its suppliers. The Company's policies reflect its commitment to acting ethically and with integrity in all its business relationships. Where necessary the Company will look to further strengthen controls throughout its business and wider supply chain and seek to develop its policies in this area in line with best practice and continuous improvement principles.

This Policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Zentura Ltd's Modern Slavery Policy for the current financial year.

## Our Organisation

Zentura Ltd is an Office Fit-out company who carry out refurbishments, fit-outs and furniture supply in commercial office spaces, primarily in London. For most projects, we are the Principal Contractor and Principal Designer in accordance with CDM regulations. We have strong partnerships with our Customers, Employees, Suppliers, and Investors.

## Risk & Exposure

The Company is exposed to a relatively low level of risk with regards to modern slavery within its own business. However, the Company is committed to identifying such risk and putting in place appropriate control measures.

A greater risk is the potential for modern slavery within the Company's supply chains. Below outlines the risk and exposures identified by us and the mitigation measures put in place in relation to the Company's staff and to its suppliers.

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# Zentura

## Staff

Zentura Ltd promotes a healthy working environment. The health and safety of staff is the Company's top priority. Their wellbeing and commitment is critical to the Company's success. Every member of staff has the right to feel safe at work and to get home safely at the end of each working day.

All staff are paid at least the national minimum wage and the Company complies with its obligations under the Working Time Regulations. All employees must adhere to the Company's Code of Conduct which is made up of number of policies including Bullying and Harassment Policy, Disciplinary Policy, Equal Opportunities Policy and Grievance Policy.

The Company operates all sites with competent management teams to ensure optimum control of the work environment. To ensure a high level of understanding of the risks of modern slavery in its business, the Company will be implementing training to all senior members of staff and the Procurement teams.

# Zentura

## Suppliers

We have identified the Company's supply chain as its most significant risk in relation to modern slavery. This includes service providers such as sub-contractors.

Where possible the Company builds long-standing relationships with suppliers and makes clear its expectations of business behaviour. The Company will report any type of supplier to the relevant authorities where it considers necessary to do so.

We expect all suppliers, and suppliers within their own supply chain, to take the same anti-slavery and human trafficking stance as the Company and, where required by law, to produce an Annual Modern Slavery Policy pursuant to section 54(1) of the Modern Slavery Act 2015.

As a minimum, the Company expects its suppliers to apply the following standards within their own business and take reasonable steps to ensure the same is adhered to within their own supply chains:

- ✓ Employment is freely chosen.
- ✓ Working Conditions are safe and hygienic.
- ✓ Child labour is not used.
- ✓ Minimum wage is paid (at least).
- ✓ No discrimination is practiced.
- ✓ No harsh or inhumane treatment.
- ✓ No Corporal punishment, withholding of wages of work carried out, mental or physical coercion or verbal abuse.
- ✓ Compliance with all applicable laws and respecting human rights.

Where the Company considers a supplier has failed to comply with any of the above, the Company will undertake an automatic review of the supplier's contract with the Company including consideration of action for a potential breach, including termination.

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# Thank You

## Zentura

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