

Human Trafficking and Exploitation Policy

Leinster maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. Leinster has a zero-tolerance approach to Human Trafficking and Exploitation both within company and within its supply chain. We have reviewed our existing compliance processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

Leinster respects fundamental human rights and is committed to the principles set out in the Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence; in particular the effective elimination of compulsory labour and child labour.

The Code of Conduct 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.

We are committed to opposing Human Trafficking and Exploitation 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 of all with whom we have business dealings. Our attitude to Human Trafficking and Exploitation is: zero tolerance.

PURPOSE OF THIS POLICY

Human Trafficking and Exploitation is a criminal offence under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (the “Act”). Human Trafficking and Exploitation can occur in various forms, including servitude, forced or 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. This document sets out the policy of Leinster with the aim of the prevention of opportunities for Human Trafficking and Exploitation to occur within its businesses or supply chain. This policy’s use of the term “Human Trafficking and Exploitation” has the meaning given in the Act.

Leinster have a zero-tolerance approach to Human Trafficking and Exploitation. 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 Human Trafficking and Exploitation is not taking place anywhere in our own businesses or those of our suppliers.

STEPS FOR THE PREVENTION OF HUMAN TRAFFICKING AND EXPLOITATION

We are committed to ensuring there is transparency in our own business and in our approach to tackling Human Trafficking and Exploitation throughout our supply chains, consistent with our disclosure obligations under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that Human Trafficking and Exploitation 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:

- a) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of Human Trafficking and Exploitation so that efforts can be focused on those areas;
- b) engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure Human Trafficking and Exploitation is not occurring in their businesses and their supply chain;
- c) introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- d) introduce contractual provisions for our 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.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the prevention of Human Trafficking and Exploitation rests with the Directors. The Directors of Leinster have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations. Managers 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 Human Trafficking and Exploitation.

ACTIONS TO REPORT HUMAN TRAFFICKING AND EXPLOITATION OR HUMAN TRAFFICKING

Employees are encouraged to raise any concerns about suspected Human Trafficking and Exploitation associated with Leinster or our suppliers and should do this either through their line manager

BREACHES OF THIS POLICY

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to Human Trafficking and Exploitation must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

REVIEW

Following its initial adoption, Human Trafficking Policy will be reviewed by Leinster Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be published annually.

Managing Director
Frank Brazil

A handwritten signature in black ink that reads "Frank Brazil". The signature is written in a cursive, flowing style with a large initial 'F' and 'B'.

1st April 2025