

Modern slavery and human trafficking policy and statement

Introduction

This policy sets out Zunoma’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2025 – 31 December 2025.

As part of the security print sector, Zunoma recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Zunoma is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The policy prohibits activities linked to slavery, forced or involuntary labour and human trafficking. It prohibits charging employees any recruitment fees or deposits, whether that is direct or through agencies or forcing them to work excessive hours. It requires that all employees are given contracts of employment, treated equally and fairly, and paid at least the minimum wage without delays or unlawful deductions and that all migrant workers are treated in accordance with UK legislation and existing all other policies.

Responsibility for Zunoma’s anti-slavery initiatives is as follows:

- Policies:** The board of directors are ultimately accountable for the company’s overall governance, including compliance with legal requirements related to modern slavery and human trafficking by providing oversight and approve the policies, ensuring alignment with the company's values and strategic objectives. The Senior Leadership Team and managers are responsible for championing the initiative and integrating it into the corporate culture. Along with the Human Resources (HR) team who are crucial in implementing training programs and ensuring that all employees understand the policies.

The procurement and compliance team implement a supplier code of conduct and engage with suppliers to ensure compliance and conduct legal research and provide guidance on best practices for policy development

- Risk assessments:** Conducting a human rights and modern slavery risk analysis is essential to identify, assess, and mitigate potential risks related to human rights violations and modern slavery within the company and supply chains through stakeholder engagements, training, monitoring, and reviewing along with implementing any mitigation strategies. Regular assessments of potential risks of modern slavery within company operations and supply chains by identifying of high-risk areas based on industry, geography, and supply chain complexity.
- Training:** Staff are provided training for employees and management on recognising and preventing modern slavery, this creates awareness campaigns to educate staff about the signs of modern slavery.

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Relevant policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise to any of the Senior Leadership Team.
- **Employee code of conduct** - The company's code makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Procurement code of conduct** - The company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.

Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits which have a degree of focus on slavery and human trafficking where general risks are identified;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The company has reviewed its key performance indicators (KPIs) considering the introduction of the Modern Slavery Act 2015. As a result, the company is

- requiring all staff in the UK to have completed training on modern slavery by 31 December 2025;

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- regularly reviewing its existing supply chains where the company evaluates all existing suppliers and new customers are evaluated prior to adding to the procurement system.

Training

The company requires all managers within the company to complete training on modern slavery.

The company's modern slavery training covers:

- purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the company;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains.

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by putting up posters across the company's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company

Encouraging feedback from employees, suppliers, and stakeholders to enhance the initiative and provide a commitment to transparency in reporting on anti-slavery efforts and outcomes.

Director approval

This statement has been approved by the company's board of directors, who will review and update it annually.

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Director's signature: 

Director's name: Philippe Ouzman

Date: 04/02/2025

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