

# **The Simba Property Group Anti-Slavery and Human Trafficking Policy for Suppliers**

## **1. POLICY STATEMENT**

**1.1** 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. The Simba Property Group 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.

**1.2** We 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 vendors/suppliers, contractors, subcontractors, consultants, and representatives supporting The Simba Property Group (collectively 'Suppliers').

**1.3** As part of our contracting processes, we include specific provisions requiring Suppliers to ensure their compliance with applicable anti-slavery laws and regulations, and we expect our Suppliers to hold their own suppliers to the same high standards.

**1.4** All Suppliers must comply with The Simba Property Group Anti-Slavery and Human Trafficking Policy for Suppliers (the 'Policy') and will all applicable anti-slavery laws and regulations, including but not limited to the UK Modern Slavery Act of 2015. This includes refraining from violating the rights of others.

## **2. THIRD PARTIES**

**2.1** Before engaging a Supplier we must complete the applicable internal company due diligence, contracting and approvals procedures. Our existing procedures involve a Supplier risk assessment process.

**2.2** As part of our risk assessment, we require terms be in place with the relevant Suppliers that bind such Suppliers to comply with all applicable anti-slavery laws, including the UK Modern Slavery Act of 2015, if such laws applied directly to such parties.

**2.3** Our Suppliers must also take reasonable steps to ensure that slavery and human trafficking are not taking place in any of their supply chains or in any part of their business. Suppliers are expected to promptly address any adverse human rights impacts of their business operations.

**2.4** In accordance with our obligations under the UK Modern Slavery Act of 2015, The Simba Property Group will annually publish a Modern Slavery Act Statement.

**2.5** All Suppliers are required to inform us: (i) if they become aware of any information that may indicate modern slavery is occurring in their business or supply chains; and (ii) of any positive changes they make to ensure there is no modern slavery in their business or supply chains.

**2.6** Each Supplier is required to provide to us within 60 days of request a written slavery and human trafficking report setting out the steps it has taken to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its business. This may include to the extent relevant, information concerning:

- (a) Their business structure and supply chains;
- (b) The policies their business has adopted to ensure there is no modern slavery, including human trafficking, forced or indentured labour, slavery or servitude, within their respective businesses;
- (c) The training and other measures used to ensure the policies and procedures are applied;
- (d) The due diligence and monitoring conducted by their business to understand the relevant risk areas and confirm that no such behaviour is occurring;
- (e) Written confirmation that no modern slavery issues have been identified in their business or supply chains in the last year;
- (f) To the extent any potential issues concerning modern slavery (including human trafficking, forced or indentured labour, slavery or servitude) have been identified within their business or supply chains, the circumstances surrounding those issues and the steps they have taken to remedy such issues; and/or
- (g) Documents evidencing the information provided in relation to the matters set out above.

### **3. RESPONSIBILITY FOR THE POLICY**

**3.1** The board of directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

**3.2** The managing director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

**3.3** 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 in supply chains.

#### **4. COMPLIANCE WITH THE POLICY**

**4.1** Suppliers must ensure that they read, understand and comply with this Policy.

**4.2** 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. Our Suppliers are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

**4.3** Suppliers are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practises in their own business and supply chains.

**4.4** If 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, Suppliers must raise it with us immediately.

**4.5** 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 that 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.

**4.6** We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy, including our Suppliers.

#### **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

**5.1** Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners and reinforced as appropriate thereafter. We expect that all our suppliers, contractors and business partners shall ensure that regular training is provided to their staff on this policy and monitor their business and all approved sub-contractors to ensure compliance.