

LOUNGES & COSY CLUB

ANTI -SLAVERY AND HUMAN TRAFFICKING ACT

EMPLOYEE AND SUPPLIER POLICY

This policy applies to all persons working for us, with us or on our behalf of us, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners and our suppliers. This policy has been approved by the Board of Directors.

POLICY STATEMENT

- 1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms: slavery, servitude, forced and compulsory labour and human trafficking. What these all have in common is the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 2 We have a zero-tolerance approach to modern slavery.
- 3 We are committed to acting ethically and with integrity in all our business dealings and relationships. We want to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 4 We are committed to ensuring there is transparency in our own business and that we are transparent about the way we expect our suppliers to act in removing any instances of modern slavery from our supply chain.
- 5 We expect that all of our contractors, suppliers and other business partners will also adopt a zero-tolerance approach. Therefore, as part of our contracting processes, we include (or will include at the point of contracting or renewal of contracts) 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.
- 6 This policy does not form part of any employee's contract of employment. We may amend it at any time.

RESPONSIBILITY FOR THE POLICY

- 7 **The Board of Directors** has reviewed and approved this policy and will be required to approve any amendment to be made to this policy to ensure it is aligned with our legal and ethical obligations. We will aim to implement a system to monitor the use and effectiveness of this policy in countering modern slavery.
- 8 **Management at all levels** are responsible for ensuring those reporting to them know about this policy, understand it and, in particular understand how to report an issue concerning this policy.
- 9 **You** are responsible for reporting if you believe or suspect that a conflict with this policy (i.e. an actual or suspected instance of modern slavery) has occurred, or may occur in the future.
- 10 We invite people at all levels 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 dedicated MSA email address; modernslavery@thelounges.co.uk

COMPLIANCE WITH THE POLICY: DON'T BE AFRAID TO SPEAK UP

- 11 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. This won't be effective without your help.
- 12 As such, you must notify your line manager as soon as possible if you believe or suspect that an actual or suspected instance of modern slavery has occurred, or may occur. Alternatively, or additionally you can raise concerns by emailing our dedicated Modern Slavery email address: modernslavery@thelounges.co.uk
- 13 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.
- 14 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.

BE CONFIDENT IN YOUR ABILITY TO REPORT

- 15** We genuinely want 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. If you are an individual, be assured that we will take you seriously. If you are a supplier, know that we are happy to provide insight and assistance to help you address coercive or exploitative work practices in your own business and supply chains.
- 16** We are committed to ensuring no one suffers any detrimental treatment (such as disciplinary action, threats or other unfavourable treatment) as a result of reporting, in good faith, their suspicion that modern slavery of whatever form may have occurred, or may occur in the future. If you are an employee of Loungers and believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure, which can be found in your Staff Handbook, on the Loungers APP or in the Loungers Bible, which is accessible at your site.

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.