

## Modern Slavery Policy

Issue Number:	2
Date of Last Review:	29 <sup>th</sup> March 2023
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### 1.0 Purpose & Scope

This statement sets out Ardent Management Limited'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 that we dissociate with any services provided to us that are in breach of this policy.

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. Ardent 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 implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

This policy applies to all employees and all are responsible for upholding the ethical and moral behaviours in accordance with this policy.

### 2.0 Policy Objectives

To inform employees about Modern Slavery and how Ardent strives to minimise the risk of this occurring within any third party we work alongside.

To inform employees of the steps Ardent will take to ensure that we protect both our people and our business from any potential threat of Modern Slavery.

To ensure that employees raise any concerns regarding Modern Slavery immediately – please see Ardent’s Whistleblowing policy.

## 3.0 Process

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. We have limited suppliers; stationery orders and outsourcing of activities such as Payroll and IT. Nonetheless, when deciding to work alongside a new organisation or supplier, Ardent will undertake due diligence as well as regularly review its existing suppliers/service providers. This involves:

- Communicating our stance on Modern Slavery and ensuring we review the suppliers/service provider’s policy on this too.
- Evaluating the modern slavery and human trafficking risks of each new Supplier
- Where possible, using preapproved suppliers/service providers for their labour standards and compliance in general to modern slavery and human trafficking
- Taking all complaints or suggestions of unlawful behaviours associated with suppliers/service providers seriously and where appropriate, disassociating from them.

Ardent operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

### Whistleblowing Policy

Ardent encourages all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

### Bullying and Harassment, Equal Opportunities and Diversity & Inclusion Policies

Ardent promotes fairness, dignity and respect for all. This policy outlines our stance on any unethical behaviours that infringe on our employees’ human rights.

## Raising Awareness and Making a Claim

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all our employees. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager and HR as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or those with whom we collaborate with at the earliest possible stage. If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify your line manager and HR or report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with your manager and HR.

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.

Ardent is committed to ensuring 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 those we associate with. If you believe that you have suffered any such treatment yourself, you should inform your manager immediately.

Whilst we do not wish to deter individuals who wish to make genuine complaints, it should be noted that vindictive or vexatious complaints will be viewed seriously and will be dealt with under the disciplinary procedure.

## Breach of 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.



## 4.0 Roles & Responsibilities

### 4.1 Employees have a responsibility to:


- Ensure they raise any concerns of Modern Slavery, however small, with their Line Manager and HR

### 4.2 Line Managers have a responsibility to:

- Take any allegations of Modern Slavery seriously and notify HR immediately
- Create an open and honest environment that actively encourages
- employees to speak up about serious issues

### 4.3 HR have a responsibility to:

- Ensure any business we work alongside are reputable and ethical in their treatment of all employees and stakeholders
- Ensure we communicate our stance on Modern Slavery to current and future employees and business we may decide to work alongside.
- Take all allegations seriously and thoroughly investigate any concerns that are raised



**Position:** Chief Operating Officer

**Print:** Carl Weaver

**Date of Issue:** 29/03/2023