

<b>Policy Title:</b>	Modern Slavery Policy Statement
<b>Policy Reference:</b>	SSHS009
<b>Issue Number:</b>	001

## Modern Slavery Policy Statement

Sterling Services (Northern) Ltd

### Introduction

Sterling Services (Northern) Ltd (hereinafter referred to as "the Company") is committed to preventing modern slavery and human trafficking in all its forms within its operations and supply chains. This policy statement outlines the Company's commitment to addressing these issues in accordance with the relevant UK legislation, including the Modern Slavery Act 2015.

### Policy Statement

#### 1. Commitment

Sterling Services (Northern) Ltd is dedicated to upholding the highest standards of ethical conduct and ensuring the well-being of all individuals involved in its business activities. We acknowledge our responsibility to take appropriate steps to prevent modern slavery and human trafficking.

#### 2. Compliance with UK Legislation

The Company will comply with all relevant UK legislation, including but not limited to the Modern Slavery Act 2015. We will ensure that our operations and business relationships do not involve any form of slavery, servitude, forced or compulsory labour, or human trafficking.

#### 3. Risk Assessment

Sterling Services (Northern) Ltd will conduct regular risk assessments to identify and assess the potential risks of modern slavery and human trafficking in its supply chains and operations. These assessments will help us understand where vulnerabilities may exist and take corrective actions accordingly.

#### 4. Due Diligence

The Company is committed to conducting due diligence on its suppliers and business partners to ensure they share our values and adhere to the principles outlined in this policy statement. We will work collaboratively with suppliers to assess and mitigate potential risks related to modern slavery and human trafficking.

#### 5. Employee Training and Awareness

We will provide training to our employees to raise awareness of modern slavery and human trafficking risks and indicators. Our employees will be encouraged to report any concerns they may have, and we will provide appropriate mechanisms for them to do so.

## 6. Reporting Mechanisms

Sterling Services (Northern) Ltd will establish clear and confidential reporting mechanisms for employees, suppliers, and other stakeholders to report any suspected cases of modern slavery or human trafficking. Reports will be thoroughly investigated, and appropriate action will be taken.

## 7. Continuous Improvement

We are committed to continuously improving our policies, procedures, and practices to address modern slavery and human trafficking effectively. We will regularly review and update this policy statement to reflect changes in legislation, industry best practices, and emerging risks.

## 8. Accountability

The Company's leadership team is responsible for the implementation and monitoring of this policy statement. They will ensure that the necessary resources are allocated to support our efforts in combating modern slavery and human trafficking.

## Conclusion

Sterling Services (Northern) Ltd is dedicated to preventing modern slavery and human trafficking in all aspects of its operations. We are committed to complying with UK legislation and maintaining the highest ethical standards throughout our supply chains and business activities. This policy statement reflects our commitment to this cause.

## Review

This policy will be reviewed periodically by Sterling Services (Northern) Ltd HR and SHEQ departments to ensure its effectiveness and relevance. A formal review will take place annually or more frequently if there are any significant changes in regulations, company structure or industry changes.

Feedback from Sterling Services (Northern) Ltd employees will be actively sought to identify areas for improvement and gauge the policy's practical application.

## Approval

This policy has been approved by Paul Blennerhassett, Managing Director of Sterling Services (Northern) Ltd

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Paul Blennerhassett  
Managing Director

03 January 2023

Issue Number:	Date:	Reviewed By:	Changes Made:	Reason for Review:
001 - Original	03/01/2019	HR, Senior Management & SHEQ Department	None	None - Original
002 - Review	03/01/2020	HR, Senior Management & SHEQ Department	None	Annual Review
003 - Review	04/01/2021	HR, Senior Management & SHEQ Department	None	Annual Review
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