

Modern Slavery And Human Trafficking Policy

1. General Policy Statement

Leisure Energy Ltd acknowledges responsibility to comply with the Modern Slavery Act 2015. We are committed to ensuring that there is transparency in our Company and in our approach to driving out acts of modern-day slavery and human trafficking both within the Company and that from the supply chain. The supply chain consists of Directors, employees, interns, external consultants, suppliers, contractors, sub-contractors, workers, agents, distributors, and all other third-party business partners.

Leisure Energy Ltd does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

We are committed to acting ethically and with integrity in all activities and business relationships and expect the supply chain to commit to the same. This includes implementing and enforcing effective systems and controls to prevent and detect modern slavery.

The Company has a zero-tolerance approach to modern slavery and human trafficking and will communicate this Policy to the supply chain at the outset of our business relationship with them and reinforce as appropriate. We expect all those in our supply chain and contractors to comply with our values.

2. What is Modern Slavery and Human Trafficking?

Modern slavery is a term used to encompass slavery, forced and compulsory labour and human trafficking of children and adults, and any activity that leads to the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is a crime and a violation of fundamental human rights.

Leisure Energy Ltd considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

3. Potential Exposure

The biggest risk to our organisation of falling foul of the Modern Slavery Act 2015 is through our procurement of goods and services. Whilst we cannot completely guarantee supplier adherence with the requirements of the legislation we will endeavour to eliminate the risks as much as possible.

We will do this by:

- Ensuring that our procurement processes, supplier Code of Conduct and Contractual Terms include specific provision relating to the Modern Slavery Act 2015 and by exercising our right to audit their activities to check compliance.

4. Management Responsibilities

The Directors have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all persons working for Leisure Energy Ltd or on our behalf in any capacity comply with it.

We shall provide adequate resources, such as training and investment, to enable understanding and compliance with this Policy and ensure that slavery and human trafficking is not taking place within the Company and within its supply chains.

The prevention, detection and reporting of modern slavery in any part of our Company or supply chain is the responsibility of all persons working for us or on our behalf in any capacity.

5. Due Diligence Processes

As part of the Company's due diligence process into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

Leisure Energy Ltd has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- We limit the geographical scope of our operations to the UK, Ireland and Europe. Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK or Ireland company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers

6. Compliance

All those working for or on behalf of Leisure Energy in any capacity must:

- Read, understand and comply with this Policy
- Avoid any activity that might lead to or suggest a breach of this Policy

7. Measures

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Right to work checks completed at recruitment stage
- Ensure minimum employment age adhered to, in line with the relevant legislation
- Always apply national minimum wage thresholds, in line with the relevant legislation

- Regular contact with material suppliers including their understanding of, and compliance with, our expectations.

8. Your Duties

- Notify your Line Manager as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future
- Raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage
- If there is uncertainty about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chain constitutes any of the various forms of modern slavery, this should also be raised with your Line Manager.

The Line Manager should then:

- Call the police on 999 in an emergency and;
- Contact the Gangmasters Licensing Authority (GLA) on 0800 432 0804 or email: intelligence@gla.gov.uk . When contacting the authorities the reporting manager will need to be clear about the circumstances and why it is considered that it is a case of modern slavery/human trafficking
- Immediately inform the Managing Director who will then determine the appropriate action to take depending on circumstances/advice given by the authorities.

9. Detrimental Treatment

We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if this turns out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our Company or in any of part of the supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable

10. Breaches of the Policy

You are expected to act in accordance with this Policy to minimise the risk of modern slavery and trafficking to both clients we directly deliver services to and to individuals associated with the supply of goods and services to. Any employee who breaches this Policy and is found to be wilfully neglectful in responding to concerns will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.


11. Suppliers, Contractors and External Partners:

In addition to reporting breaches to the appropriate authorities, Leisure Energy reserves the right to terminate the Contract/Partnership Agreement where a supplier, contractor or external partner has been found to be in breach of the Modern Slavery Act.

Ongoing Review

This Policy statement will be reviewed annually by the Directors to ensure its continuing suitability and relevance to the Company activities. This will include both a review of internal operations and the supply chain and other external operations to check compliance with the above Policy and to check that our Policy is being implemented effectively.

Signed:


Mike Worsnop (Jan 8, 2026 19:17:56 GMT)

Michael Worsnop
Director






LE - Modern Slavery and Human Trafficking Policy - 2026 2027

Final Audit Report

2026-01-08

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