

N / B / T Y

ANTI-SLAVERY POLICY

1. Introduction

Modern-day slavery comes in many different guises. It includes the exercise of ownership over a person, services coerced under threat, human trafficking and child labour exploitation. All instances of modern slavery have in common the violation of the human rights of an individual for the benefit of another.

2. Statement of Principles

Way With Words condemns modern slavery in all its manifestations and has a zero-tolerance approach to it. The company believes in the ethical treatment of the individual and in respect for human rights and dignity and encourages and promotes a corresponding attitude in its directors, employees, and contractors.

3. The Purpose of this Policy

In addition to setting out the statement of principles above, this policy serves to outline the initiatives, assessments and due diligence formulated by the company and implemented by its directors and managers to limit the risk of modern slavery occurring within its business or supply chain. It also states the responsibilities of company directors, employees and contractors and the consequences of a breach. The policy is subject to review and may be amended from time to time at the discretion of the company.

4. Preventative Measures

To demonstrate its commitment to the principles set out in this policy, maintain transparency and ensure that modern slavery is not taking place in its business or supply chain, the company:

- conducts regular assessments to ascertain where areas of risk in the business may lie in order to focus its efforts on those areas;
- pre-screens applicant independent contractors to ensure their understanding of the principles set out in this policy;
- has written agreements with its contractors containing provisions which require them to adhere to those principles;
- engages with its contractors on an ongoing basis to evaluate and confirm their commitment to the principles;
- does not employ in any capacity the services of any person under the minimum legal working age applicable to such person;
- ensures that its employees are aware of the need to be vigilant and report any concerns which they may have about suspected modern slavery associated with the company or any of its contractors.

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5. Responsibilities

5.1 Ultimate responsibility for the implementation of this policy and ensuring compliance with all legal and ethical obligations rests with the company's directors.

5.2 All Way With Words' employees and contractors are responsible for reading and confirming their willingness to comply with the policy principles and for acting in a way that is consistent with its values.

6. Reporting Modern Slavery

6.1. Internal

Employees who suspect an incidence of modern slavery associated with the company or with any of its contractors should raise their concerns with the Compliance Officer of the company. See Way With Words' Whistle-Blower Protection Policy in this regard.

6.2. External

Contractors and other non-employees should address an email to the Compliance Officer of the company at compliance.officer@waywithwords.net to raise any concerns, or suspicions regarding modern slavery in any part of the company or its supply chain. See Way With Words' Whistle-Blower Protection Policy.

7. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal. The company will terminate its relationship with any contractor who is in breach. In all cases, further legal steps may be taken which may include criminal prosecution.