

MODERN SLAVERY POLICY

Modern Slavery 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.

Lundy Projects Limited have 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 does not form part of any employee's contract of employment and we may amend it at any time.

Lundy Projects Limited is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Lundy Projects Limited or on our behalf in any capacity, including Directors, permanent employees at all levels, temporary employees on assignment, volunteers, agents, external consultants, third-party representatives and business partners. Any imported goods or services from sources 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. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

Responsibility for the Policy

Lundy Projects Directors have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it. The Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels within the business are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager 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 the supply chains 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 manager. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the company or the supply chain constitutes any of the various forms of modern slavery, raise it with your manager.

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.

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 own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager.

Communication and Awareness of the Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery will be communicated to all contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee or temporary employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Lundy Projects Limited will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The policy will be monitored and reviewed annually during the Lundy Projects Limited Management Review Meeting.

This policy and a copy of the Modern Slavery Act 2015 will be accessible to all Lundy Projects Limited full-time employees and can be obtained on request. Assigned temporary employees will be issued with an electronic copy this policy as part of the company's Induction process.

Signed:-

A handwritten signature in black ink, appearing to be 'Alejandro Moreno', written over a horizontal line.

Alejandro Moreno Managing Director

Date: April 2020