

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



Introduction

This policy sets out Santa Fe Group'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 its supply chains. Santa Fe maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, the Group is absolutely committed to preventing slavery and human trafficking.

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. We 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

Organisational Structure and Supply Chains

This policy covers all the activities of Santa Fe Group and its subsidiaries. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Santa Fe and/or any member of our Group, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

Responsibility

The Group HR department will liaise with other relevant departments such as the Supply Chain and Legal team to ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required.

Relevant Policies and Practices

Santa Fe operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

The Group's policy on whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Group's Whistleblowing Policy. The nature of the complaint will determine the Group's next course of action.

We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential employee's right to work is carried out before any offer of employment is made.

Santa Fe Group expects its subsidiaries and all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request demonstration of compliance with this policy.

Awareness & Performance Indicators

As well as training employees, the Group will raise awareness of modern slavery issues by posting the Group's anti-slavery and human trafficking policy to all employees via Yammer. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

This policy on modern slavery will be communicated to all suppliers, contractors and business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.