

45. Labour Standards Policy

Reviewed By: Alex Bywater

Review Date: 15th April 2025

1. Purpose & Commitment

Woodhurst Consulting is committed to upholding the highest standards of labour and human rights across all business activities and throughout our supply chain. This policy outlines our commitment to ethical working practices, fair treatment, and prevention of exploitation, including modern slavery, human trafficking, child labour, and forced or bonded labour.

1. Scope

This policy applies to all employees, contractors, agency workers, and business partners acting on behalf of Woodhurst. We also expect our suppliers and partners to uphold these principles in their own operations and supply chains.

1. Core Labour Standards

Woodhurst adheres to the following principles:

- **No Forced or Bonded Labour:** We prohibit any use of forced, bonded, or involuntary labour in any form. Identity documents must never be withheld.
- **No Child Labour:** We do not employ anyone under the minimum legal working age. Our suppliers must do the same.
- **Freedom of Association and Collective Bargaining:** We respect all workers' rights to join trade unions, participate in collective bargaining, and freely associate.
- **Fair Working Hours:** Employees are not required to work excessive hours. Working hours comply with UK law and ILO standards, including the provision of at least one day off in every seven-day period.
- **Wages and Benefits:** We ensure all workers receive at least the national minimum wage and fair, timely payment. No recruitment-related fees are charged to workers.

- **Equal Opportunity and Non-Discrimination:** As reflected in our Equal Opportunities and Diversity Policy, all employment decisions are based on merit, without discrimination on the basis of gender, race, disability, age, sexual orientation, religion, or any other protected characteristic.
- **Safe and Respectful Work Environment:** We prohibit all forms of harassment, bullying, and abuse, and promote a culture of dignity and respect.

1. Modern Slavery and Human Trafficking

Woodhurst maintains a zero-tolerance approach to modern slavery, in accordance with the *Modern Slavery Act 2015*. Our policy is to:

- Include anti-slavery clauses in all supplier contracts.
- Conduct due diligence on suppliers where appropriate.
- Provide training to staff on identifying and reporting modern slavery risks.
- Encourage reporting of concerns through a whistleblowing mechanism.

(See full *Anti-Slavery Statement*, section 22 of our Employment Policy.)

1. Supply Chain Standards

We require our suppliers to:

- Adhere to all applicable labour laws and regulations.
- Prohibit modern slavery, child labour, or exploitative practices.
- Comply with our Code of Conduct and anti-slavery clauses.
- Provide written terms of employment to all staff.
- Support employee access to grievance mechanisms and protect against retaliation.
- Participate in audits or checks upon request.

1. Monitoring and Due Diligence

- We monitor worker conditions internally through periodic review of employment terms and practices.
- While we do not currently conduct regular third-party supplier audits, we reserve the right to do so.

- No incidents of modern slavery have been identified within our operations or supply chain to date.

1. Training and Awareness

Modern slavery awareness forms part of onboarding for relevant employees and is reviewed periodically. Refresher communications are shared through internal channels.

1. Governance

- Policy Owner: Chief Operating Officer
- Last Reviewed: 15 April 2025
- Next Review: 15 April 2025
- Escalation of concerns: Line Manager or Company Director
- Whistleblowing protection in place