



Modern Slavery and Human Trafficking Policy September 2024

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Quality Leisure Management Ltd is a wholly owned subsidiary of PHSC Plc

PHSC plc

Introduction

Although Quality Leisure Management Ltd does not come within the legal requirement for development and implementation of a formal policy for Modern Slavery and Human Trafficking we recognise the importance of this issue for our staff, suppliers and customers. This policy has been developed in accordance and alongside the policy statement of our parent group, PHSC plc which applies to all subsidiaries within the PHSC plc Group. The policy will receive ongoing monitoring and oversight by the Board of Directors.

Policy Statement

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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our subsidiaries.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, associated and any partner organization.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the Policy

The board of directors (plc) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The CEO of the Plc has overall accountability for meeting this policy, and the Managing Director in each subsidiary has 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 are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate information and guidance on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to CEO of PHSC plc.

Compliance with the Policy

All staff are to read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All staff are to notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Personnel are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business at the earliest possible stage.

If a member of staff believes or suspects a breach of this policy has occurred or that it may occur they must notify their Managing Director as soon as possible. Note that where appropriate, and with the welfare and safety of workers as a priority, we will give support and guidance to our clients, associates, suppliers etc... to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, then it should also be reported to the managing director.

Quality Leisure Management Ltd aims 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 of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Breaches of This Policy

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