



JAMES LYNCH & SONS (TRANSPORT) LTD

FORCED LABOUR POLICY STATEMENT

James Lynch & Sons (Transport) Limited (hereafter referred to as 'The Company') states that under no circumstances will it make use of forced or bonded labour.

All employees shall have the right to enter into employment voluntarily and freely, without the threat of a penalty. The policy is applicable to all personnel as well as interns, consultants and any other person performing a task in the company.

The Company's principle of No Forced Labour is based on International Labour Organization (ILO) conventions and national laws and recognises regional and cultural differences. The Company forbids the use of coercion, violence, threat of penalties, or other intimidating practices like confiscation of personal documents (only copies) or wage punishments (information about wage cuts should be provided in the employee handbooks).

Employees shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length (in accordance with national law or mutual agreement) at any time without penalty. Employees on contracts of fixed duration shall not be required to serve beyond the expiry of their contract. All terms and conditions of service should be specified in employment contracts for which the employees should provide informed consent.

The Company recognises the responsibility that it shares with suppliers, sub-contractors, and recruitment services (collectively referred to as "Suppliers") to tackle forced labour. This policy represents a clear contractual obligation as condition for any business relationship with the Company. The Company will not tolerate the use of unlawful forced labour within and will not accept products or services from suppliers that employ forced labour or apply similar practices.

GENERAL PRINCIPLE

Forced labour is work performed under compulsion (including slavery, servitude and forced recruitment) and subject to a penalty. It is, in all its forms, an abuse of fundamental human rights and it is prohibited in all circumstances. It is explicitly banned by four major international human rights agreements: the 1926 Slavery Convention; the 1948 Universal Declaration of Human Rights; the 1956

Supplementary Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices similar to Slavery; and the 1966 International Covenant on Civil and Political Rights (ICCPR).

“Forced Labour” as presented in the Company’s policy shall refer to all forms of forced labour, including but not limited to: child labour, human trafficking (e.g. derived from migration for employment), involuntary prison labour, coercion in wage payment (including debt bondage and bonded labour), threat of disciplinary measures, compulsory overtime or document retention.

All labour should be freely chosen and employees should be free to leave in accordance with the employee’s contract. A company should make sure all the employees present themselves voluntarily for work and are free to leave.

IMPLEMENTATION

The Company shall establish clear policies that can be easily delivered and spread in the workplace to ensure a companywide awareness of the company’s legal and ethical responsibilities. Staff with managerial positions should oversee the compliance with the policy in their area of responsibility and all employees shall be alert to any indicator of forced labour in the supply chain. Regular audits can be carried out in the supply chain. The Company shall also provide a focal point/ designated person that can receive and elaborate complaints and denunciations, ensuring the privacy of the people involved. The Company shall then investigate (with or without involvement of third parties) on the matter and in no way will allow retaliation.

PREVENTION

The Company shall provide written contracts of employment in language that all employees can easily understand. The contract shall include all terms of service and clearly indicate employees and employers’ rights and responsibilities with regard to payment of wages, working hours, valid grounds for termination, and other issues related to preventing forced labour. The Company shall also provide a “Supplier Code of Conduct” with which suppliers are expected to comply and it may be imposed as a contractual obligation.

REPORTING FORCED LABOUR

All the company staff members are encouraged to report any case of non-compliance with the policy. The employees should be aware that they have a moral and ethical duty to report such instances and should not fear retaliation. The Company recognises the importance of confidentiality and could grant anonymity to the complainants who wish so, giving that such information does not impede the investigation or resolution of the dispute. There should be no limitation to the filing of complaints, in terms of accessibility to all employees and quantity. The Company will make sure that the employees know where and to whom they can refer for denounces or complaints. The Company ensures that appropriate measures and punishment will be applied in case of non-compliance with such policy.

MONITORING

The Company may conduct regular audits in all its facilities and structures to ensure that no forms of forced labour are taking place in the workplace. The Company could also perform internal surveys or initiatives to encourage the employees to always report violations of its policies. All concerns related to the policy shall be freely raised and appropriately handled and followed up by the Company.

REMEDICATION AND PUNISHMENT

Violations of the No Forced Labour policy may lead to disciplinary action up to, and including, termination of employment/ partnership. Disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements. The Company shall take immediate and effective measures to prevent and eliminate any form of forced labour such as debt bondage, serfdom, forced or compulsory labour, and all forms of slavery and practices similar to slavery. In case The Company is accused or found guilty of negligence in assuring that no kinds of forced labour is taking place in the workplace, it will resolve the matter as soon as possible and provide remediation to the parties victim of such negligence or mistake.

Signed REdwards Director 1st May 2024

SIGNED MOwen Director 1st May 2024

Signed IParker Transport Manager 1st May 2024