

Human Trafficking and Modern Slavery Policy



ORGANISATION STRUCTURE

Level Peaks Associates (LPA) Limited supplies world-class systems to the UK Ministry of Defence, UK Police Forces, a range of NATO military forces and specialists who demand the best capability. We supply tactical capabilities ranging from polymer rifle magazines and fully scalable integrated combat clothing systems to unmanned air systems and advanced rocket systems.

LPA is committed to maintaining a workplace free from human trafficking, forced labour, and unlawful child labour. We recognise our responsibility to uphold ethical and lawful employment practices and require the same standards from all suppliers across our global supply chain. These expectations have been clearly communicated to all suppliers.

LPA has zero tolerance for unlawful child labour or forced labour in the production of goods or delivery of services. We will not knowingly procure products or services from suppliers that employ or engage in any form of child labour or forced labour.

Human trafficking and modern slavery are serious violations of human rights and international law. These crimes persist in many parts of the world, and this policy outlines the measures LPA takes to prevent human trafficking and slavery within our operations and throughout our supply chain.

By engaging with international supply chains, LPA is able to offer a broad range of capabilities while sourcing as directly as possible. This approach supports greater transparency across our supply chains and provides clarity for all stakeholders and interested parties.

LPA's headquarters is situated at Unit 4 & 7, Hereford Trade Park, Holmer Road, Hereford, HR49SG.

An additional office operates at Unit 10A, Parkstone Bay Marina, Turks Lane, Poole, Dorset, BH14 8EW.

Company Registered Number: 06379641

Company Registered VAT Number: GB991991164

Year 2025 turnover: £42,512,103

RISK ASSESSMENT

LPA actively undertakes risk assessments across its supply chain, considering a range of factors, including:

- Country risk profiles, informed by the Global Slavery Index ([Global Slavery Index | Walk Free](#))
- The presence of vulnerable groups, including but not limited to:
 - Children and young people
 - Migrants, refugees, and asylum seekers
 - Individuals experiencing poverty
 - Homeless or displaced individuals
 - Victims of domestic abuse or social isolation
 - Individuals with mental or physical disabilities, or other dependencies
 - Marginalised communities
- The nature of the goods and services provided by our suppliers

This assessment process is ongoing. The findings will inform LPAs response, including the development and implementation of appropriate controls, mitigation measures, and continuous improvement

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initiatives across our supply chain.

POLICIES

LPA has implemented the following policies and procedures to support the identification, prevention, and reporting of slavery and human trafficking within our operations and supply chain:

- Whistleblowing Policy** – We encourage employees, customers, and suppliers to raise any concerns or suspicions relating to slavery or human trafficking without fear of retaliation or disadvantage. This policy is accessible to all employees via the company’s SharePoint, and new employees receive a copy as part of their employee handbook. The policy also includes contact details for an independent whistleblowing charity, as well as the details of LPAs designated Whistleblowing Officer.
- Employee Code of Conduct** – All employees are required to review and sign the Employee Code of Conduct as part of their employment contract. This code outlines LPAs expectations regarding professional behaviour, ethical standards, and compliance, while encouraging employees to act responsibly and with integrity in the best interests of both the company and themselves.
- Supplier Code of Conduct** – All suppliers are provided with a Supplier Code of Conduct for review and acknowledgment. This code sets out LPAs expectations of suppliers and establishes the ethical and operational standards required throughout our business relationships and partnerships.

DEFINITIONS

Human Trafficking

The recruitment, transportation, transfer, harbouring, or receipt of persons through the use of force, threats, coercion, abduction, fraud, deception, abuse of power, or exploitation of vulnerability, or through the giving or receiving of payments or benefits to obtain control over another person for the purpose of exploitation.

Forced Labour

Any work or service that is not performed voluntarily and is obtained from an individual through threats, coercion, force, or the imposition of penalties.

Harmful Child Labour

The employment of children in work that is economically exploitative, hazardous, or likely to interfere with their education, or that may be harmful to their health or physical, mental, spiritual, moral, or social development.

TRAINING REQUIREMENTS

LPA has implemented an e-learning programme for all employees, which must be completed annually. The training is also assigned to all new employees as part of their induction process. Currently, 97% of employees have successfully completed the training. Monthly reviews of the internal training matrix are carried out to monitor completion status and identify any expired training, with regular reminders issued to employees to ensure compliance and timely completion.

SUPPLY CHAIN

As part of our supplier onboarding process, LPA requires all new suppliers to complete a supplier account form. This form captures whether the supplier has an Anti-Slavery and Human Trafficking Policy, or an equivalent policy, and requires them to provide a copy for review where applicable.

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Where a supplier does not have a policy, or an equivalent framework in place, an internal review is conducted to assess the supplier and determine the level of strategic risk associated with engaging them. Based on this assessment, suppliers are assigned a risk rating, which informs the due diligence process and the appropriate course of action to be taken.

Where suppliers are engaged as part of a tendering process, LPA flows down all applicable contractual requirements, including obligations relating to Modern Slavery and Human Trafficking, for review and acceptance. Once agreed and signed, suppliers are contractually bound to comply with these requirements.

DUE DILIGENCE FOR SUPPLIERS

LPA is a member of SEDEX, a non-profit membership organisation that operates one of the world’s largest collaborative platforms for responsible sourcing data. With over 50,000 members across 150 countries, SEDEX enables organisations to share and access supply chain information to support ethical business practices. This membership allows LPA to conduct due diligence on suppliers, while also enabling partners and customers to conduct due diligence on us. It also facilitates SMETA audits, which are among the most widely used social audit methodologies globally, assessing key areas such as labour standards, health and safety, environmental performance, and business ethics.

LPA identifies its core suppliers across Tier 1 to Tier 3 based on strategic importance. Using the Global Slavery Index, each supplier’s country of operation is assigned a corresponding risk rating. Based on this assessment, the following due diligence approach is applied:

- **High Risk Suppliers** – Comprehensive assurance through an on-site internal and/or third-party audit
- **Medium Risk Suppliers** – Completion of detailed supplier self-assessment questionnaires
- **Low Risk Suppliers** – Acknowledgement and acceptance of the Supplier Code of Conduct

MEASURING EFFECTIVENESS

Through SEDEX, LPA continues to monitor supplier risk and compliance on an ongoing basis. The continued application of our policies is expected to further reduce areas of risk across our supply chain. The effectiveness of these measures is regularly reviewed through annual management review meetings, ensuring ongoing improvement and alignment with our ethical sourcing standards.

COMPLIANCE TO LPA’S REQUIREMENTS

LPA expects all suppliers to conduct business with honesty and integrity and to comply with the following minimum standards:

- Suppliers must not use forced or compulsory labour, meaning any work or service performed involuntarily under threat of penalty.
- Employment must be freely chosen, and all terms of employment must be voluntary.
- Suppliers must comply with all applicable legal minimum age requirements for employment.
- Workers must be compensated with wages and benefits that meet or exceed applicable legal requirements.
- Suppliers must comply with all applicable laws governing maximum working hours.
- A safe and healthy working environment must be provided, including any accommodation supplied by the company.
- Suppliers must promote a diverse workplace and ensure an environment free from discrimination, harassment, and any form of abuse.

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ACCEPTANCE OF TERMS

Any purchase orders sent from Level Peaks Associates will require suppliers to acknowledge their compliance, principles and requirements of this policy and suppliers should be able to demonstrate compliance at the request of Level Peaks Associates and ensure this policy or their own policy is cascaded down to sub tier suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Human Trafficking and Modern Slavery statement for the financial year ending 2026.

Signed:

Sam Swinton
Business Director

Date: 30/04/2026

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