

Human Trafficking and Modern Slavery Policy



OGANISATION STRUCTURE AND SUPPLY CHAINS

Level Peaks Associates (LPA) Limited supply world class systems to 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 rockets systems.

LPA is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. We believe we are responsible for promoting ethical and lawful employment practices. These practices are also required to be followed by all our suppliers worldwide and have been communicated to them.

LPA will not tolerate the use of unlawful child labour or forced labour in the manufacturing of products or services and does not intend to accept products or services from suppliers that employ or utilise child or forced labour in any manner. Human trafficking and slavery are crimes under international law, these crimes exist in many countries throughout the world and this policy defines how LPA will make all efforts to prevent human trafficking and slavery from not only within the organisation but also from its supply chain.

Using international supply chains allows LPA to offer a diverse range of capabilities and aims to source as directly as possible which enables transparency to all our supply chains and interested parties.

OUR BUSINESS AND TURNOVER

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 2024

Annual turnover of £54,999,439

DEFINITIONS

Human trafficking

The recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or any other forms of abduction, fraud, of deception, of the abuse of power or a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour

All work or service, not voluntarily performed, that is obtained from individual under the threat of forced or penalty.

Harmful Child Labour

Consist of the employment of children that is economically exploitative or is likely to be hazardous to or interfere with, the Childs education, or to be harmful to the Childs health or physical mental, spiritual, moral, or social development.

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TRAINING REQUIREMENTS

Employees are required to participate in training so they can identify signs of human trafficking and modern slavery. This training is tracked and recorded on our in-house training portal.

WHISTLEBLOWING POLICY

The whistleblowing policy is available on SharePoint to all employees, and a copy is sent to all new starters. The policy provides a clear reporting structure for an individual to report any suspected wrongdoing. Contact details of an independent whistleblowing charity are given within the policy and details of the LPA whistleblowing officer.

DUE DILIGENCE FOR SUPPLIERS

LPA are members of SEDEX, a non-profit membership organisation that is home to one of the largest collaborative platforms for sharing responsible sourcing data on supply chains, with over 50,000 members across 150 countries. This enables us to conduct due diligence and have due diligence conducted on us by partners and customers. It enables a SMETA audit to be conducted, one of the most widely used audit procedures in the World to assess supply chain activities (including labour rights, health & safety, the environment and business ethics).

MEASURING EFFECTIVENESS

Using SEDEX we continue to monitor supplier risk and compliance. Through the continued implementation of our policies, we expect to see further reduction in areas of risk.

We continually monitor effectiveness through annual management review meetings.

COMPLIANCE TO LPA'S REQUIREMENTS

LPA expects its suppliers to conduct business with honesty, integrity and adhere to the following standards:

1. Will not use forced or compulsory labour i.e., any work or service that a worker performs involuntarily under threat of penalty.
2. Will ensure the terms of employment are voluntary.
3. Will comply will minimum age requirements prescribed by applicable law.
4. Will compensate its workers with wages and benefits that meet or exceed the legal requirements.
5. Will comply with applicable law concerning maximum hours of work.
6. Will provide a safe and healthy working environment. (Including any company provided living quarters).
7. Will encourage diverse workplace and provide a workplace that is free from discrimination, harassment and any other form of abuse.

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ACCEPTANCE OF TERMS

Any purchase orders sent from Level Peaks Associates Limited 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 Limited and ensure this policy or their own policy is cascaded down to sub tier suppliers.

Signed:

Sam Swinton
Business Director

Date: 31/03/2025

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