

## **Anti-Slavery & Human Trafficking Policy**

### **1. Policy Statement**

- 1.1 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 to exploit them for personal or commercial gain.
- 1.2 Diamond has a zero-tolerance approach to Modern Slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to implementing and enforcing effective, transparent systems and controls to guard against Modern Slavery taking place in our own business or in any of our supply chains.
- 1.3 We expect the same high standards from all our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against Modern Slavery, and we expect that our suppliers will hold their own suppliers to the same high standards as set out in this Policy.

### **2. Who does this Policy apply to?**

- 2.1 This Policy applies to all persons working for us or on our behalf in any capacity, including Diamond Employees, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.2 This Policy is not contractual and does not form part of Diamond Employees terms and conditions of employment. The Policy may be subject to change at the discretion of Diamond at any time.

### **3. Who is responsible for this Policy?**

- 3.1. Diamond's Board of Directors have overall responsibility for this Policy and have delegated the day-to-day responsibility for its operation to the General Counsel & Company Secretary.
- 3.2 Any comments, queries or suggestions relating to this Policy should be sent to [legal@diamond.ac.uk](mailto:legal@diamond.ac.uk).

### **4. Identifying risks**

- 4.1 We have identified that procuring and concluding supplier arrangements in high-risk jurisdictions and in the construction and electronics manufacturing sectors are particular risks for our business. To mitigate these risks we ensure our agreements include obligations on suppliers to comply with Modern Slavery laws.

- 4.2 To address those risks and, in accordance with the Modern Slavery Act 2015, Diamond prepares and publishes on its website an [Anti-Slavery and Human Trafficking Statement](#) for each financial year outlining the steps Diamond has taken during that financial year to ensure that Modern Slavery is not taking place in any of its supply chains or in any part of its own business.
- 4.3 Diamond ensures awareness of this Policy forms part of the induction process for all Diamond Employees and communicates its zero-tolerance approach to Modern Slavery to all persons working for us or on our behalf in any capacity at the outset of the relationship and reinforced as appropriate thereafter.

## **5. Your responsibilities**

- 5.1 You must ensure that you read, understand and comply with this Policy and undertake any training that is required of you by Diamond.
- 5.2 The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or on our behalf. You should co-operate with Diamond in eliminating any risk of Modern Slavery within our own activities and supply chain and escalate any concerns or issues in accordance with paragraph 6 of this Policy.

## **6. How to raise a concern**

- 6.1 You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chain at the earliest possible stage. You should notify your line manager, and/or your Diamond contact and/or send an email to [legal@diamond.ac.uk](mailto:legal@diamond.ac.uk) as soon as possible if you believe or suspect that a breach of this Policy has occurred, or may occur in the future. Alternatively, if you are a Diamond Employee, you can report any such concerns in accordance with our Whistleblowing Policy available on Diamond's intranet.
- 6.2 Diamond 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 that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery is (or may be) taking place in any part of our business or in any of our supply chains. If you believe that you have suffered any such treatment, you should send the details to [legal@diamond.ac.uk](mailto:legal@diamond.ac.uk) as soon as possible. If the matter is not remedied, and you are a Diamond Employee, you should raise it formally using our Grievance Procedure available on Diamond's intranet.

## **7. Breaches of this Policy**

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

## **8. Accessibility**

- 8.1 At Diamond we understand that there are differences amongst Diamond Employees in terms of the protected characteristics contained within the Equality Act 2010 i.e. age, disability, gender

reassignment, marriage & civil partnerships, pregnancy & maternity, race, religion or belief, sex (gender) and/or sexual orientation. We therefore aim to deliver policies and services which are efficient and effective, accessible to all, and which meet different needs. If you need any help to understand this Policy or require any additional support, please contact [legal@diamond.ac.uk](mailto:legal@diamond.ac.uk).

## 9. Amendments to this Policy

- 9.1 This Policy will be reviewed biennially by the General Counsel & Company Secretary or earlier if required due to a change in legislation or regulation.
- 9.2 If any issue arises under the Policy, which need to be addressed, it will be the most recently published version of this Policy that will apply.

## 10. Definitions

For the purposes of this Policy, the following definitions shall apply:

**Diamond:** Diamond Light Source Ltd, a company incorporated and registered in England and Wales, with company number 4375679 and with registered office at Diamond House, Harwell Science & Innovation Campus, Didcot, Oxfordshire, OX11 0DE, United Kingdom.

**Diamond Employee(s):** Any person(s) working for Diamond under a contract of employment.

**Modern Slavery:** the deprivation of a person’s liberty by another to exploit them for personal or commercial gain such as slavery, servitude, forced and compulsory labour and human trafficking.

<b>Document Control Table</b>	
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Policy Owner:	General Counsel & Company Secretary
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