

MODERN SLAVERY ACT POLICY

1) PURPOSE

Wellity Limited is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (“human trafficking and slavery”). We strongly believe that we are responsible for promoting ethical and lawful employment practices. These practices are also required to be followed by our supply chain and subcontractors. This policy also complies with the Modern Slavery Act 2015.

2) SCOPE

This policy covers all employees of Wellity Limited and their supply chain.

3) DEFINITIONS

- 3.1 Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of 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.
- 3.2 Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
- 3.3 Harmful Child labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

4) POLICY

Wellity Limited will not tolerate the use of unlawful child labour or forced labour in the services it provides and will not accept products or services from Suppliers that employ or utilise child labour or forced labour in any manner. These crimes exist in countries throughout the world. This Policy is to define how Wellity Limited will make efforts to eradicate human trafficking and slavery from not only within its organisation but also from our supply chains.

5) ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This policy covers the business activities of Wellity Limited which are as follows:

Wellity Limited

The company currently operates in the following countries:

United Kingdom

6) HIGH RISK ACTIVITIES

In general, Wellity Limited considers its exposure to slavery/human trafficking to be relatively limited.

7) DUE DILIGENCE

The company undertakes due diligence in relation to Slavery and Human Trafficking including conducting a review of the controls of its suppliers and training staff in the principles of Modern Slavery.

8) RESPONSIBILITIES

The responsibility for the prevention of modern slavery rests with the Company's Chief Executive Officer and Management team.