

Human Resources Policy

MODERN SLAVERY POLICY STATEMENT

Revision: 08/2026

Control Doc No.:	UKHUNI-HR-POL-000-REV-000	Revision:	000	
Title:	MODERN SLAVERY POLICY STATEMENT	Date for review:		
Date:	06/08/2026	Approved:	The Directors	
Author:	Brentwood Employment Relations Specialists	Date of approval:		

1. POLICY STATEMENTS

Ukhuni Business Furniture (Pty) Ltd ("the Company") is committed to conducting business ethically, with integrity, and in a manner that respects and upholds human rights. The Company maintains a zero-tolerance approach to all forms of modern slavery, including forced labour, bonded labour, human trafficking, child labour, servitude, and any other form of exploitation.

The Company recognises its responsibility to identify, prevent, and address the risks of modern slavery within its operations, business relationships, and supply chain. We are committed to ensuring that all employees are treated fairly, work voluntarily, receive lawful remuneration, and are employed in accordance with applicable labour legislation and internationally recognised human rights principles.

Ukhuni Business Furniture (Pty) Ltd expects all employees, contractors, suppliers, service providers, and business partners to share this commitment and to conduct their activities in a manner that is consistent with this policy. The Company will not knowingly engage with, or continue to do business with, organisations that participate in or knowingly benefit from modern slavery practices.

The Company is committed to:

1. Complying with all applicable labour, employment, and human rights legislation.
2. Promoting ethical recruitment and fair employment practices.
3. Providing a workplace free from coercion, intimidation, exploitation, discrimination, and abuse.
4. Assessing and, where appropriate, monitoring modern slavery risks within its supply chain.
5. Encouraging employees and stakeholders to report suspected instances of modern slavery without fear of retaliation.
6. Investigating reports of suspected modern slavery promptly and taking appropriate corrective action where necessary.

Any employee, supplier, contractor, or other stakeholder found to be involved in modern slavery practices may be subject to disciplinary action, termination of employment or contractual agreements, and, where appropriate, referral to the relevant authorities.

Ukhuni Business Furniture (Pty) Ltd is committed to continuously reviewing and improving its policies, procedures, and due diligence processes to ensure that modern slavery has no place within its business or supply chain.

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2. PURPOSE

2.1 The purpose of this Policy is to:

- 2.1.1 Demonstrate the Company's commitment to preventing modern slavery and human trafficking.
- 2.1.2 Promote ethical business practices throughout the organisation.
- 2.1.3 Ensure compliance with applicable South African labour legislation and internationally recognised human rights standards.
- 2.1.4 Establish responsibilities for identifying, reporting, and addressing modern slavery risks.
- 2.1.5 Protect the rights and dignity of all employees and individuals associated with the Company's operations.

3. SCOPE

3.1 This Policy applies to:

- 3.1.1 All permanent, temporary and fixed-term employees.
- 3.1.2 Directors and management.
- 3.1.3 Contractors, consultants and agency workers.
- 3.1.4 Suppliers, subcontractors and service providers.
- 3.1.5 Any person or organisation conducting business on behalf of Ukhuni Business Furniture (Pty) Ltd.

4. DEFINITIONS

4.1 For the purposes of this Policy:

- 4.1.1 Modern Slavery refers to situations where individuals are exploited and cannot refuse or leave due to threats, coercion, deception or abuse of power.
Modern slavery includes, but is not limited to:
 - 4.1.1.1 Forced or compulsory labour.
 - 4.1.1.2 Human trafficking.
 - 4.1.1.3 Debt bondage or bonded labour.
 - 4.1.1.4 Child labour prohibited by law.
 - 4.1.1.5 Domestic servitude.
 - 4.1.1.6 Forced marriage where it results in labour exploitation.
 - 4.1.1.7 Any other practice that deprives a person of their freedom for exploitation.

4.1.1 Modern Slavery refers to situations where individuals are exploited and cannot refuse or leave due to threats, coercion, deception or abuse of power.

4.1.2 Modern slavery includes, but is not limited to:

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5. ROLES AND RESPONSIBILITIES

5.1 Management

Management is responsible for:

- 5.1.1 Demonstrating leadership in preventing modern slavery.
- 5.1.2 Ensuring this Policy is implemented throughout the organisation.
- 5.1.3 Assessing and managing identified risks.
- 5.1.4 Supporting investigations into reported concerns.
- 5.1.5 Taking appropriate disciplinary or contractual action where required.

5.2 Human Resources

Human Resources is responsible for:

- 5.2.1 Ensuring recruitment practices comply with labour legislation.
- 5.2.2 Verifying that employment is voluntary and lawful.
- 5.2.3 Maintaining employment records.
- 5.2.4 Providing awareness and guidance relating to this Policy.

5.3 Employees

Employees must:

- 5.3.1 Comply with this Policy.
- 5.3.2 Report any suspected incidents of modern slavery.
- 5.3.3 Cooperate with investigations.
- 5.3.4 Treat all colleagues, contractors and suppliers with dignity and respect.

5.4 Suppliers and Contractors

Suppliers and contractors are expected to:

- 5.4.1 Operate ethically and lawfully.
- 5.4.2 Ensure their own supply chains do not involve modern slavery.
- 5.4.3 Cooperate with any reasonable due diligence requests made by the Company.

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6. RECRUITMENT AND EMPLOYMENT PRACTICES

- 6.1 The Company is committed to fair and ethical employment practices and will:
- 6.1.1 Ensure all employment is entered into voluntarily.
 - 6.1.2 Verify employees' legal right to work where applicable.
 - 6.1.3 Pay employees in accordance with applicable labour legislation.
 - 6.1.4 Prohibit retention of passports, identity documents or personal property as a condition of employment.
 - 6.1.5 Ensure employees are free to terminate their employment in accordance with applicable legislation and contractual obligations.

7. SUPPLIER DUE DILIGENCE

- 7.1 The Company expects suppliers and contractors to maintain standards consistent with this Policy. Where appropriate, the Company may:
- 7.1.1 Conduct supplier due diligence.
 - 7.1.2 Request confirmation of compliance with labour and employment legislation.
 - 7.1.3 Assess suppliers identified as presenting a higher risk.
 - 7.1.4 Require corrective action where concerns are identified.
 - 7.1.5 Suspend or terminate business relationships where serious breaches are identified.

8. REPORTING CONCERNS

- 8.1 Any employee or stakeholder who reasonably suspects modern slavery or human trafficking must report the matter immediately to:
- 8.1.1 Their Line Manager;
 - 8.1.2 Human Resources; or
 - 8.1.3 Senior Management.
- 8.2 Reports will be treated confidentially, investigated appropriately and handled in accordance with the Company's disciplinary procedures and applicable legislation.
- 8.3 The Company prohibits retaliation against any person who reports a concern in good faith.

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9. TRAINING AND AWARENESS

- 9.1 The Company may provide appropriate awareness and training to management and employees regarding:
- 9.1.1 The indicators of modern slavery.
 - 9.1.2 Reporting obligations.
 - 9.1.3 Ethical recruitment practices.
 - 9.1.4 Supplier expectations.
- 9.2 Training requirements will be reviewed periodically based on operational needs and identified risks.

10. BREACH OF THIS POLICY

- 10.1 Employees who breach this Policy may be subject to disciplinary action, up to and including dismissal, in accordance with the Company's Disciplinary Code and applicable labour legislation.
- 10.2 Suppliers, contractors or other third parties found to have engaged in modern slavery practices may have their contracts terminated and may be reported to the appropriate authorities where required.

11. MONITORING AND REVIEW

- 11.1 The Company will periodically review this Policy to ensure its continued effectiveness and compliance with legislative developments and best practice.
- 11.2 Management will monitor implementation and make improvements where necessary to strengthen the Company's commitment to preventing modern slavery.

12. RELATED LEGISLATIONS AND REFERENCES

- 12.1 This Policy should be read together with:
- 12.1.1.1 Constitution of the Republic of South Africa, 1996.
 - 12.1.1.2 Basic Conditions of Employment Act, No. 75 of 1997.
 - 12.1.1.3 Labour Relations Act, No. 66 of 1995.
 - 12.1.1.4 Employment Equity Act, No. 55 of 1998.
 - 12.1.1.5 Children's Act, No. 38 of 2005.
 - 12.1.1.6 Prevention and Combating of Trafficking in Persons Act, No. 7 of 2013.
 - 12.1.1.7 Occupational Health and Safety Act, No. 85 of 1993.
 - 12.1.1.8 Universal Declaration of Human Rights.

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12.1.1.9 International Labour Organization (ILO) Fundamental Conventions.

13. POLICY REVIEW

13.1 This Policy will be reviewed periodically or earlier should legislative changes, operational requirements, or organisational needs necessitate amendments.

14. APPROVAL

14.1 This Policy is approved by Executive Management and is effective from the date of implementation.

14.2 All employees are required to familiarise themselves with this Policy and comply with its provisions at all times.

15. AUTHORISATION



MANAGING DIRECTOR

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