

MODERN SLAVERY POLICY

SCOPE

Modern slavery is a criminal offence under the UK Modern Slavery Act 2015.

The Modern Slavery Act 2015 imposes obligations on organisations which carry out business in the United Kingdom. Modern slavery can occur in various forms, including servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Polar Ice Ltd. have adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term 'modern slavery' has the meaning given to that term in the Modern Slavery Act 2015.

Forced labour is a criminal offence in the Republic of Ireland under the Criminal Law (Human Trafficking) (Amendment) Act 2013. Forced labour means a work or service which is exacted from a person under the menace of any penalty and for which the person has not offered himself or herself voluntarily, notwithstanding the exemptions detailed in Part 1 (c) of the Criminal Law (Human Trafficking) (Amendment) Act 2013.

This policy applies to all employees, officers and directors of Polar Ice Ltd. and all its subsidiary companies.

POLICY STATEMENT

Polar Ice Ltd. has a zero-tolerance approach to modern slavery or forced labour. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. We expect the same high standards from all of our contractors, suppliers and other business partners.

In summary, Polar Ice Ltd;

- have a zero-tolerance attitude to modern slavery.
- are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.
- demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

PREVENTION OF MODERN SLAVERY

In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall:

- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery.
- engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Modern Slavery Act 2015 (United Kingdom) and the Criminal Law (Human Trafficking) (Amendment) Act 2013 (Republic of Ireland).

POLICY VIOLATION

An employee or contractor involved in a wrongdoing in breach of this policy may face the following consequences:

- any employee involved will be subject to the disciplinary procedures then in force and applying to the applicable employee, which may result in penalties being imposed on that employee (up to and including dismissal).
- a wrongdoing by a contractor, casual or agency worker will be reported to the relevant person's employer and may result in the termination of the service contract with the contractor, contracting company, casual or agency worker. Polar Ice Ltd may take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the employee/contractor and/or other individuals concerned.

EQUAL OPPORTUNITIES POLICY

Polar Ice Ltd. positively encourages a culture of equality for all, where employees are recruited, developed, remunerated and promoted on the basis of their skills and suitability for the work performed.

Polar Ice Ltd. is committed to making full use of the talents and resources of all its employees, and to ensuring that no employee receives objectively unjustified less favourable treatment on the grounds of their gender, race, colour, ethnic origin, membership of the travelling community, marital status, family status, disability, religion, sexual orientation, age, nationality, part-time or fixed term status. All employees will be made aware of the provisions of this policy and are required to ensure that the policy is carried out in its entirety.

MINIMUM WAGE REFERENCE PERIOD: 3 WEEKS

This is a defined period used to calculate hourly rate of pay for the National Minimum Wage Act 2000 (period cannot exceed one month). The employee may, under Section 23 of the National Minimum Wage Act 2002, request from the employer a written statement of the employee's average hourly rate of pay for any pay reference period falling within the previous 12 months as provided in that section.

AMENDMENTS

This policy may be revoked, replaced or changed at any time. Staff will be informed of any material changes made to the policy.