

# MODERN SLAVERY POLICY

## 1.0 Introduction

We are committed to acting ethically, and with integrity, in all our business dealings and relationships. We want to make sure that modern slavery and human trafficking is not taking place within our business or its supply chains.

The Modern Slavery Act 2015 places businesses of a certain size under a legal obligation to publish a slavery and human trafficking statement each year. These businesses also have to report on steps taken during the year to make sure that modern slavery and human trafficking is not taking place in any part of their businesses or supply chains.

Based on our global annual turnover, we are not currently legally required to publish a slavery and human trafficking statement each year. However, we are committed to the abolition of modern slavery and human trafficking. Our business undertakes appropriate due diligence to assess the risk of such issues arising both within the business and within its supply chain.

This Policy:

- Explains the concept of modern slavery and human trafficking
- Sets out our commitment to being a business which is free from modern slavery and human trafficking and how we will achieve this
- Explains how you can help us to conduct our business free from modern slavery and human trafficking

This Policy applies to all those who work in the business, including employees, workers, agency staff, self-employed contractors and volunteers. Everyone working for us has a role to play in preventing modern slavery and human trafficking.

Please note that this Policy does not form part of your contract with us. We reserve the right to amend or remove this Policy.

## 2.0 What is Modern Slavery?

Slavery is not something which is confined to the history books. Modern slavery exists in many forms, even here in the UK. It is rooted in the idea of forced labour – positions where a person is required to work and cannot refuse to work or leave because of threats of violence, coercion or deception or abuse of power. It includes holding a person in a position of slavery, servitude, or forced or compulsory labour.

## 3.0 What are our commitments in this area?

It is a priority for us that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

HR is responsible for making sure that all those working for us have actively chosen to work with us and are not being coerced or controlled in any way. They will do this through the open appraisal structure and by following up on any concerns raised.

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We recognise that the biggest risk of modern slavery within our business comes from the actions of those in our supply chain. We look at each aspect of our supply chain and assess the risk in each area. Where appropriate, we will require our suppliers to confirm that there is no slavery or human trafficking within their business or that of their suppliers.

We will take seriously all reports received raising concerns regarding modern slavery within our business and its supply chain, and we will investigate each one.

#### **4.0 What are your responsibilities?**

You should take the time to read and understand this Policy and appreciate the importance of working with us on modern slavery and human trafficking issues.

If your job involves procurement i.e. you obtain goods or services for us as part of your job role, then you should make sure you due diligence checks have taken place before approving any supplier.

You should avoid any conduct which might lead to, or suggest, a breach of this Policy.

You should, using the procedure below, raise a concern at the earliest opportunity if you believe that a breach of this Policy has occurred or if you have any wider suspicion of modern slavery in any part of our business or supply chains.

#### **5.0 What to do if you have a concern**

If you believe or suspect that a breach of this Policy has occurred or that modern slavery or human trafficking may exist in a part of our business (or within our supply chains), then you should report your concern in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether something constitutes a breach of this Policy or indicates modern slavery or human trafficking, then we encourage you to discuss this issue with the HR department.

If your concern relates to the conduct of a supplier, then you should not make any direct accusations or approaches to the supplier yourself. You should act in accordance with the protocol for raising concerns set out in our Whistleblowing Policy.

#### **6.0 Appropriate reporting and breaches of this Policy**

We will support all who raise genuine concerns in good faith under this Policy. We are committed to ensuring that you do not suffer any detrimental treatment in any form as a result of raising genuine concerns in good faith under this Policy. If you believe you have suffered unfavourable treatment, then you should inform your line manager or consult our Grievance Policy.

If you are found to have acted in breach of this Policy or contrary to its aims and objectives, then we may take disciplinary action against you up to and including termination of your employment. If you are not an employee, then we may terminate any other form of engagement you may have with us.

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## 7.0 Review of the Policy

The Policy will be reviewed on a regular basis in the light of operating experience and/or changes in legislation.

Signed:



Tommy Cubby  
Managing Director

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