



<b>Title of Policy:</b>	<b>Section:</b>
<b>Modern Slavery</b>	<b>Human Resources</b>

## Policy Statement

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, apprentices and any other third party representative.

We expect all who have, or seek to have, a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values. This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

## What is Modern Slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery – where ownership is exercised over an individual
- Servitude – involves the obligation to provide service imposed by coercion
- Forced and compulsory labour – all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking – involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include child labour. Whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.



## Our Supply Chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK suppliers

Most supplies are procured from large established UK companies also committed to the abolition and removal of modern slavery wherever it may be found.

## Our Policies in Relation to the Modern Slavery Act 2015

The following policies are available to all staff.

- Code of Conduct
- Business Ethics policy
- Whistleblowing policy
- Bullying and Harassment policy
- Diversity and Inclusion policy
- Recruitment and Selection policy

### Embedding the principles

We will continue to embed the principles through:

- providing awareness to staff on the Modern Slavery Act 2015.
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

### How we seek to embed our anti-slavery policy in practice

To underpin our policy commitments, we are in the process of implementing the following measures. This policy is to be shared with and highlighted to all of the Company's staff with guidance to raise any matters in connection with it to their line manager by way of the Company Grievance Procedure or Whistleblowing Policy.

This policy is to be incorporated into the Company's induction process so that it is brought to new staff's attention when they start work.

We will inform any suppliers or contractors of the updated policy and Modern Slavery statement, providing them with a copy to ensure their compliance.

## Responsibility for This Policy

The board of directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations. All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance



of their roles. All employees who suspect any members of the workplace being victim of modern slavery should notify their line manager.

The Company will take further steps to ensure sufficient communication and employee awareness training with regards to Modern Slavery. All employees will be made aware of our Whistleblowing policy and procedure. The purpose of this procedure is to enable the Company to thoroughly investigate allegations of any wrongdoing raised by employees within our Company without fear of reprisal.

## Breaches of This Policy

Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the directors.

## Policy Status and Reviews

This Anti-slavery policy will be reviewed by the Company's board of directors on a regular basis, at least annually. This policy does not give contractual rights to company employees, and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them. We will continue to review processes and adhere to current legislation.

### **Policy Reviewed on Date of Implementation by the Following Company Officer:**

**Full name:**

Robert Firmin

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**Job Title:**

Managing Director

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**Signature:**

*R. Firmin*

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