

Modern Anti-Slavery Policy

1. Overview

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 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.

We will only do business with organisations who fully comply with this policy [or those who are taking verifiable steps towards compliance].

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).

2. What do we mean by 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, but are not limited to:

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.

3. Procedure

To underpin our policy commitments, we are in the process of implementing the following measures over the course of the financial year 2019/20:

Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy. We will also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

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4. Responsibility

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.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns should refer to the organisations Whistleblowing Policy for information on how to report such concerns.

5. Communication and Employee Awareness

The HR department will ensure that all staff receive adequate training (if applicable) and communication on this policy and any supporting processes applicable to their role.

6. 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.

7. Status of this Policy

This Anti-Slavery policy will be reviewed on a regular basis.

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

We keep records for as long as necessary in accordance with applicable data protection laws. Wherever possible these will be treated as confidential.