

Modern Slavery and Human Trafficking



Policy Statement

Our organization adopts a zero-tolerance stance towards Modern Slavery and Human Trafficking. These crimes represent a profound violation and abuse of fundamental human rights.

- Modern slavery refers to a broad range of practices, including slavery, servitude, forced and compulsory labour, bonded and child labour, and human trafficking.
- Human trafficking involves the facilitation or arrangement of travel for an individual with the intent to exploit them.

This policy is applicable to all individuals working for or on behalf of our organization in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

We unequivocally prohibit the use of modern slavery and human trafficking within our operations and supply chain. This policy is non-contractual and may be amended at our discretion.

Commitment

We are committed to ensuring transparency in both our operations and approach to addressing modern slavery across our supply chains, in compliance with the disclosure requirements outlined in the Modern Slavery Act 2015 (as amended).

The prevention, detection, and reporting of modern slavery within any segment of our organization or supply chain are the collective responsibilities of all personnel working for or on our behalf.

Commitment (continued)

Employees are expected not to engage in, facilitate, or neglect to report activities that could lead to or suggest a breach of this policy. We actively engage with stakeholders and suppliers to mitigate the risk of modern slavery across our operations and supply chain. We expect the same high standards from our contractors, suppliers, and other business partners. As part of our procurement processes, we include clear prohibitions against the use of forced, compulsory, or trafficked labour, or any individual held in slavery or servitude, whether adult or child. Furthermore, we expect our suppliers to hold their own suppliers to these same standards.

Due Diligence

We are committed to preventing slavery and human trafficking and have established policies and procedures to ensure that our employees are not subject to exploitation and that they work in a safe and supportive environment.

To uphold this commitment, we have implemented the following measures:

- All employees are provided with a contract of employment outlining their rights and obligations, including the terms for resignation, allowing employees to freely terminate their contract at any time.
- We verify the identity and right to work of all employees in the UK.
- We do not retain any employee's personal identity documents (e.g., passport) during their employment.
- We comply fully with all relevant legislation regarding working hours, statutory time off, holiday entitlements, emergency leave, sickness, family rights, and minimum rest periods.
- We adhere strictly to National Minimum Wage legislation.

Due Diligence (continued)

We also have in place systems to:

- Identify and assess potential risk areas within our supply chains.
- Mitigate the risk of slavery and human trafficking occurring within our supply chains.
- Monitor and review potential risk areas within our supply chains.
- Safeguard whistle-blowers.

Training and Awareness

We recognize the importance of ensuring that our employees understand the issue of modern slavery, can identify the warning signs, and know how to report potential incidents within our supply chain. To this end, we may provide training sessions on modern slavery, particularly for those employees engaged with suppliers, to help them recognize risks specific to their supply chains and identify potential issues during the supplier onboarding process, as well as through ongoing supplier reviews and assessments.

Warning Signs

It is essential that all employees understand what constitutes modern slavery and human trafficking, recognize the warning signs, and know how to report concerns. Below are some potential warning signs (though this list is not exhaustive):

- Physical signs of abuse, malnourishment, or withdrawal from social interaction.
- Isolation or the appearance of being under the control or influence of another person, rarely working independently or interacting with others.

Warning Signs (continued)

- Substandard living conditions, such as employees living at their workplace.
- Limited personal belongings and repetitive clothing, often inappropriate for the type of work being undertaken.
- Unusual or excessive working hours with little or no breaks.
- Avoidance of eye contact, signs of fear or anxiety.

Reporting Process

We encourage transparency and will support anyone who raises genuine concerns in good faith under this policy, even if their suspicions are ultimately found to be mistaken. We are committed to ensuring that no individual faces any detriment as a result of reporting suspicions of modern slavery occurring within our organization or supply chain.

If you suspect or believe that a breach of this policy has occurred, you must report it to Head of People.

Every report will be taken seriously and fully investigated. We will ensure that individuals who raise concerns are not subject to retaliation. If an individual feels unsafe or fears for their personal protection, they may request to remain anonymous. We will offer full support during the investigation of any genuine violation of this policy.

Breaches

Any employee found to be in breach of this policy, without a satisfactory justification, will face severe disciplinary action, up to and including summary dismissal. If individuals or organizations working on our behalf are found to have violated this policy, we will take appropriate corrective action to address the breach.
