



Policy Documentation

Anti-Slavery and Human Trafficking Policy

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Anti-Slavery and Human Trafficking Policy

APPROVAL

The signatures below certify that this policy has been authorised and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by				
Reviewed by				
Approved by				

AMENDMENT RECORD

This policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

COMPANY PROPRIETARY INFORMATION

The electronic version of this document is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this document is uncontrolled, except when provided with a document reference number and revision in the field below:

Document Ref. _____ Rev _____

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Anti-Slavery and Human Trafficking Policy

1 AIMS OF THIS POLICY

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 associates, directors, officers, agency workers, contractors, consultants, volunteers, interns and any other third-party representative.

We always expect all who have or seek a business relationship with the company to familiarise themselves with this policy and to act 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.

Anti-Slavery and Human Trafficking Policy

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 EMBEDDING THE ANTI-SLAVERY POLICY IN PRACTICE

To underpin our policy commitments, we aim to implement the following measures over the course of the financial year:

- We will conduct regular risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, as informed by our risk assessment, we will engage directly with new and current suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains, and, where appropriate, agree how such measures should be enhanced.

Anti-Slavery and Human Trafficking Policy

4 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.

The HSEQ Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

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.

5 COMMUNICATION AND ASSOCIATE AWARENESS TRAINING

The HSEQ Manager will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role.

In addition, staff will receive training on the broader issues of modern slavery to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

6 BREACHES OF THIS POLICY

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

Anti-Slavery and Human Trafficking Policy

The breach of this policy by an associate, 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 fully be expected to co-operate 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 HSEQ Manager.

7 STATUS OF THIS POLICY

This Anti-slavery policy will be reviewed by the Company's Senior Management Team on a regular basis.

This policy does not give contractual rights to company associates 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.