

OUR POLICY ON ANTI-SLAVERY AND HUMAN TRAFFICKING

What's this policy about?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We're committed to acting ethically and with integrity in all our business dealings and relationships and we'll implement and enforce effective systems and controls to ensure modern slavery doesn't take place anywhere in our own business dealings and relationships. We'll implement and enforce effective systems and controls to ensure modern slavery doesn't take place anywhere in our own organisation or in any of our supply chains.

We're also committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy:

- sets out our responsibilities, and the responsibilities of those working for and on our behalf, to observe and uphold our position on modern slavery and human trafficking; and
- provides information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

Is this policy part of my contract of employment?

No, and we can change this policy at any time, but if any changes are made, we'll always make you aware of them.

Who's covered by this policy?

This policy applies to all employees, directors and other officers, workers and agency workers. We also require in any contracts with self-employed consultants or contractors that they comply with this policy, and we'll make sure they're given access to a copy. All these people are referred to as 'Staff' in this policy.

Who's responsible for this policy?

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

While we ask all managers to take primary and day-to-day responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it, and to go back to your manager with any questions you may have. References to Directors in this policy mean the most senior people within our organisation.

What are your responsibilities and how do you raise a concern?

You must ensure that you read, understand and comply with this policy.

Everyone working for us or under our control is responsible for preventing, detecting and reporting modern slavery in any part of our organisation or supply chains. You must avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

You're encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has happened or that it may happen, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you're unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We aim to encourage openness and we'll support anyone who raises genuine concerns in good faith under this policy even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own organisation or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you've suffered any such treatment, you should tell your manager immediately. If the matter is not resolved and you are an employee, you should raise it formally using our Grievance procedure.

Training and communication

Training on this policy, and on the risk our organisation faces from modern slavery in its supply chains, forms part of the induction process for everyone who work for us, and we'll provide regular refresher training as necessary.

We'll communicate our commitment to addressing the issues of modern slavery in our organisation and supply chains to all our suppliers, contractors and business partners at the outset of our business relationship with them and reinforce it as appropriate after that.

Breaches of this policy

We take a strict approach to breaches of this policy.

If you're our employee and you breach this policy, you'll face disciplinary action, which could result in your dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

And that's it... for now

We understand that things change, so we'll continue to review the effectiveness of this policy and make sure it's achieving its objectives.