

## Anti-Slavery Policy

### What is slavery?

- Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. You may think this whole subject is irrelevant to us, but it is not.
- At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- The Modern Slavery Act 2015 covers four activities:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed using coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation

- This policy covers all four activities.
- The Modern Slavery Act 2015 recognises the important part organisations can and should play in tackling slavery. With this in mind, we need to pay particularly close attention to:
  1. Our supply chain;
  2. Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards; and
  3. Cleaning and casual labour suppliers.

### Responsibilities

- The Company, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.
- Everyone must observe this policy and be aware that turning a blind eye is unacceptable.

### The Company will:

1. Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation.
2. Be clear about our recruitment policy.
3. Check our supply chains.
4. Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us.

5. Ensure we have in place an open and transparent grievance process for all staff.
6. Seek to raise awareness so that our colleagues know what we are doing to promote their welfare.
7. Make a clear statement that we take our responsibilities to our employees and our clients seriously.
8. Uphold the minimum wage policy.

### Managers will:

1. Listen and be approachable to colleagues
2. Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
3. Remain alert to indicators of slavery (see Identifying slavery)
4. Raise the awareness of our colleagues, by discussing issues and providing training,
5. Ensure everyone can spot the signs of trafficking & exploitation and know what to do
6. Use their experience and professional judgement to gauge situations

### Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

1. Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure.
2. Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill- treated.
3. Tell us if you think there is more we can do to prevent people from being exploited.

### The risks

The principal areas of risk we face, related to slavery and human trafficking, include:

1. Supply chains.
2. Recruitment through agencies.
3. We manage these risk areas through our procedures set out in this policy and elsewhere.