

Our Policy Statement on Modern Slavery and Human Trafficking

This statement sets out the steps we will take, and continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

As a company, we have a zero tolerance to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or our supply chain.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Act. We expect the same high standards of suppliers.

Our Supply Chain

We work with a small range of suppliers who provide goods and services across a number of different categories, such as equipment and product supplies, IT and telecoms, legal and other services. Therefore, we have close relationships with our suppliers and good visibility of our supply chain, and do not feel that it is particularly susceptible to labour exploitation or other forms of slavery and human trafficking. Nevertheless, we are committed to preventing these practices from occurring within our supply chain by continued :

1. Mapping of our suppliers;
2. Vetting of supply chain suppliers through the use of supplier-questionnaires
3. Working towards including appropriate anti-modern slavery terms in our agreements with suppliers

The Company will never knowingly support or deal with any business involved in slavery or human trafficking.

Protect Whistle Blowers

We will afford protection as set out in our Whistle Blowing Policy.

We encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking.

Our Own Business

Our policy is to directly employ staff working on our contracts. We ensure we comply with the relevant legislation relating to employment, including any minimum wage, holiday, maternity or other entitlements.

Within our own Business, we:

1. Commit to embedding a culture where all workers are treated with dignity, respect and with a sense of worth.
2. Accept that recruitment is a business cost, and will not allow these to be paid by job applicants.
3. Will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
4. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation
5. Check Sub-contractors: We review our sub-contractors to ensure that only directly employed labour work for our sub-contracting companies, and that those companies provide evidence that they comply with the Anti-slavery Act
6. Audit & review our practices to check that all employees have the right to work within the UK
7. Ensure that modern compliant payroll systems, as well as electronic time, attendance & staff monitoring systems are in place to reinforce compliance
8. Communicate with staff and outline reporting methods including whistle blowing procedures to ensure compliance.
9. Will continue to train staff to look out for potential indicators of worker exploitation. To this end, reporting leaflets in multi language formats are being sited in workplaces and we will also provide these materials to our sub-contractors.

Review

This Anti-Slavery Policy will be reviewed annually by the Director and may be amended from time to time.

This Policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking Statement.