



# Anti-Slavery and Human Trafficking Policy

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# Anti-Slavery and Human Trafficking

## 1.0 Policy Statement

In accordance with our vision and values, it is our policy to conduct all of our business in an accountable and collaborative manner.

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 have a zero-tolerance approach to modern slavery and 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 own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and we expect the same high standards from all of our contractors, suppliers and other business partners.

## 2.0 About this Policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, sub- contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 3.0 Who must comply with this Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.1 The SHEQ Coordinator has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3.3 All staff and contractors must read, understand and comply with this policy.

3.4 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.5 You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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

3.7 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager as soon as possible.

3.8 If you are 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 line manager or the SHEQ Coordinator.

We aim to encourage openness and will 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 that no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business 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 have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure which can be found on our company intranet.

## 4.0 Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery will be communicated to all contractors and business partners through the circulation of this policy and reinforced as appropriate thereafter.

## 5.0 Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in 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.

## 6.0 Interaction with other Workplace Policies and Procedures

This Anti-Slavery and Human Trafficking Policy is supported by our Grievance Policy, which can be found on the company intranet.

All employees at all levels, Directors, officers and Agency Workers are encouraged to familiarise themselves with both of these policies. If you have any queries please contact the SHEQ Coordinator or a member of the HR team.

## 7.0 Definitions

### Slavery

- The state or condition of being a slave; a civil relationship whereby one person has absolute
- power over another and controls his life, liberty, and fortune
- The subjection of a person to another person, in being forced into work
- The condition of being subject to some influence or habit
- Work done in harsh conditions for low pay

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## Servitude

- The state or condition of a slave
- The state or condition of being subjected to or dominated by a person or thing
- (law) a burden attaching to an estate for the benefit of an adjoining estate or of some definite person

## Forced and compulsory labour

- Labour done because of force; compulsory labour

## Human Trafficking

- Human trafficking is the trade of humans, most commonly for the purpose of sexual slavery, forced labour, or commercial sexual exploitation for the trafficker or others

## Child Labour

- The employment of children in an industry or business, especially when illegal or considered exploitative.

## Revision details

**May 2019 Rev 0.0**

**First Intranet Issue**

All documents now stored on the Company intranet.