

MODERN SLAVERY POLICY

POLICY STATEMENT

Modern slavery is an international crime and we are committed to taking all necessary steps to prevent it within our business and within our supply chains. As such we expect the same commitment from our contractors, suppliers and business partners and will therefore adopt a zero tolerance approach to any potential or actual breaches of this policy.

This policy demonstrates our wish to be transparent about the steps and preventative measures that we have implemented to tackle modern slavery and to prevent the possible exploitation of anyone who may work for us or who is involved in our business.

All individuals working for us, in every capacity, are therefore expected to be familiar with this policy and proactive in preventing modern slavery. This includes employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners (collectively referred to as '**employees**' throughout the remainder of this policy).

Whilst this policy does not form part of your contract of employment we expect compliance with this policy at all times and any breach or suspected breach will be dealt with in accordance with the Company's Misconduct Policy and Procedure.

WHAT IS MODERN SLAVERY?

Modern slavery can take many forms and it encompasses slavery, human trafficking, forced labour and domestic servitude. It is largely a covert crime, where victims tend to be controlled and hidden away and particular vigilance is therefore needed to detect it.

Modern slavery is a violation of fundamental human rights – it may also constitute a criminal offence. Examples include:

- *Human trafficking*: where people (including those under 18) are moved either internationally or domestically in order to be exploited. This offence may be committed even where the victim consents to travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.
- *Forced labour*: where victims are forced to work against their will, often working very long hours for little or no pay and subjected to verbal or physical threats of violence to them or their families. This also includes victims being forced to work to pay off debts that will never realistically be paid.
- *Sexual exploitation*: where victims are forced to perform sexual acts against their will and can affect men, women and children.
- *Criminal exploitation*: where victims are forced to carry out criminal acts against their will.
- *Domestic servitude*: where victims are forced to carry out household duties in private households for little or no pay, where their movements are controlled and contact with external people is severely restricted.

IDENTIFYING MODERN SLAVERY

Anyone may become a victim of modern slavery (including UK citizens) and requires us to be extremely vigilant and questioning if we are to identify potential victims. The following examples of behaviour should raise concerns and initiate further investigation:

Victims may:

- Appear withdrawn, look malnourished or unkempt, or show signs of physical or psychological abuse.
- Rarely be allowed to travel on their own, seem under the control and/or influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- Be living in dirty, cramped or overcrowded accommodation and/or living and working at the same address.
- Have no identification documents, have few personal possessions and always wear the same clothes day in day out.
- Have little opportunity to move freely and may have had their travel documents retained (e.g. passports).
- Be dropped off/collected for work on a regular basis either very early or late at night.
- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcement agencies for many reasons (such as not knowing who to trust or where to get help, fear of deportation, and fear of violence to the individual or their family).

WHAT ARE MY RESPONSIBILITIES IN RESPECT OF MODERN SLAVERY?

Everyone who works for us, or is under our control is responsible for helping to bring modern slavery to an end. Preventing, detecting and reporting modern slavery in any part of our business or supply chains is everyone's collective responsibility.

However, we don't expect you to become a detective. We believe that by raising awareness of the existence and types of modern slavery, and educating you about indicators that may suggest it is taking place will assist us to be more alert to the issue and encourage reporting of suspected incidences of modern slavery.

All **recruiting managers** must ensure that:

- Recruitment suppliers are only used who appear on our approved list and who have provided documentary proof of the steps they have taken to prevent modern slavery.
- All staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- All staff are legally able to work in the UK and that any agency has conducted these checks prior to providing candidate details to us.
- Proof of names and residential address are checked during the recruitment and on-boarding process. If there appears to be a high number of people residing at the same address this in itself may indicate potential exploitation.
- All workers are aware of their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

All **managers** should:

- Ask questions about the people in your team - they may tell you something that might indicate that they are in an exploitative situation.
- Follow up anything an individual tells you that raises concern - they may tell you for example that they have to pay for accommodation, food, transport or other services to a third party or agency.

All **employees** should:

- Remain vigilant and if you suspect that someone is being controlled or forced by someone else to work or provide services, tell your manager or other appropriate person such as a member of the HR Team.

- Report if an unknown person appears to be monitoring the movements of one of our workers or appears to be controlling them in some way which may include the worker being collected and dropped off at work each day.
- Speak to your manager or a member of the HR Team if a colleague tells you something you think might indicate that they are being exploited or ill-treated. Raising your concerns in this way may stop someone else from being exploited or abused.
- Be alert and report any suspicious activity, as people may try to use business premises to traffic people.
- If you think that a situation is not right, ask questions and report any concerns or suspicions you have to your manager or a member of the HR Team.

REPORTING SUSPECTED MODERN SLAVERY

If you think that you may have come across an instance of modern slavery you should always report it to your manager, supervisor or the Group Human Resources Director.

In addition you can also report suspected instances of modern slavery to the police by calling 101. If you believe potential victims are in immediate danger then you should call 999. Please also ensure that you inform your manager if you report suspected cases to the Police as soon as reasonably possible after you have made the call.

The Government's 24-hour **Modern Slavery Helpline** may be reached by calling **0800 0121 700**. This helpline is available for victims, employers, employees and members of the public to call for expert support and advice. You will be provided with information and guidance on what to do next.

PROTECTION AND SUPPORT FOR EMPLOYEES

We understand you may be worried about possible repercussions if you report any suspicions about modern slavery. We encourage all employees to be open and will support anyone who raises genuine concerns about modern slavery even if they subsequently prove to be unfounded.

Please remember however that making malicious or intentionally false allegations is a serious disciplinary offence which may result in you being subjected to disciplinary action up to and including dismissal for gross misconduct in accordance with the Company's Misconduct Policy and Procedure.