

Slavery and Human Trafficking Statement

What this Policy Covers

Slavery and Human Trafficking remain a hidden blight in our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Our Commitment

The company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking is not taking place in any business or organisation that has any sort of business relationship with our company.

Due diligence processes for slavery and human trafficking

The company has zero tolerance for slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk, the company has systems to encourage reporting concerns and protecting whistle-blowers.

Our supply chain providers are expected to have suitable anti-slavery and human trafficking policies and processes.

Potential exposure

The company considers its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

The company considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains and therefore the company follows the following steps to minimise that potential risk.

Steps

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

In accordance with section 54(4) of the Modern Slavery Act 2015 (the Act), the company has contacted (or attempted to contact) all first-tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.

The company has taken action to monitor reports of modern slavery and cross-referenced such reports with our first-tier supply chain. The company will seek to discontinue business with any first-tier supplier found by the enforcement authorities to be involved in modern slavery.

The company encourages the use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and has been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking

The company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains:

Use of labour monitoring, right-to-work documentation, and payroll audits

We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.

We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

Assessment of effectiveness in combatting modern slavery

To ensure effectiveness in combatting modern slavery, the company maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.

Following a review undertaken for the company's statement of the previous financial year, the company confirms its supplier list is up to date for the current financial year.

As in the previous financial year, there have been no reports that any of the company's suppliers have been involved in activities covered by the Modern Slavery Act.

Director

The Company has a director, to whom all concerns regarding modern slavery should be addressed. The Director works with the HR team to undertake an annual review of the company's obligations towards eradicating modern slavery within its organisation and supply chains.

Review

This statement pursues Section 54(1) of the Modern Slavery Act 2015 and applies to all companies within and associated with the company. It is reviewed for each financial year.

Reporting Suspicions of Slavery

Employees can report any suspicions of slavery either through the Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://modernslavery.co.uk/contact.html>

0800 0121 700

This statement relates to the 2021/2022 financial year and was approved by:



Mike O'Toole
Managing Director
01-06-2023