

MODERN SLAVERY POLICY

(July 2019)

1. POLICY STATEMENT

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. Furthermore, we implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own organisation, and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our partners and suppliers. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

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, seconded workers, volunteers, interns, 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.

2. RESPONSIBILITY FOR THE POLICY

The Executive Director has overall responsibility for ensuring this policy is implemented and complies with our legal and ethical obligations.

The Deputy Director 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.

Colleagues at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

3. COMPLIANCE WITH THE POLICY

1. All employees must ensure they read, understand and comply with this policy.
2. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us, whether directly or indirectly. It is a requirement to avoid any activity that might lead to, or suggest, a breach of this policy.
3. The Executive Director must be notified as soon as possible where a conflict with this policy is believed or suspected to have occurred, or may occur in the future.
4. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.
5. Where it is suspected that a breach of this policy has occurred—or that it may occur—employees are required to notify a manager or report it in accordance with our Complaints Procedure and Whistleblowing Policy as soon as possible.
6. If it is unclear whether a particular act, or treatment of workers or their working conditions more generally, within any tier of our operation constitutes one of the various forms of modern slavery, employees must raise it with the Executive Director or Deputy Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, including where it does not lead to further action. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If an employee believes they have suffered any such treatment, they should inform their manager (or a senior manager) immediately.

4. COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. 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.