

Anti-Slavery and Human Trafficking Policy



Version 1.1

*Owner: Group General Counsel and Company
Secretary*

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Approved by: Executive Committee

Version	Date	Comment
1.0	January 2017	Version 1.0 published.
1.1	May 2017	Minor amendments to wording.

1. Policy Statement

- 1.1 This policy applies to everybody who works for us or on our behalf in any capacity. This includes but is not limited to all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. You must ensure that you read, understand and comply with this policy.
- 1.2 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. Through threats, violence or coercion, victims of modern slavery are forced to work for little or no money, live in squalid accommodation and may have their identity documents taken away from them.
- 1.3 We have a commitment to:
- do all that we reasonably can to prevent all forms of modern slavery
 - act ethically and with integrity in all our business dealings and relationships
 - implement and enforce effective systems and controls.
- 1.4 We are also committed to ensuring there is transparency in our own business. This includes our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, and/or of anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

- 1.5 You should be vigilant in recognising some tell-tale signs that something may be wrong:
- (a) workers who don't have written contracts of employment
 - (b) workers who have had to pay fees to obtain work
 - (c) workers who are not able to prove they are legally entitled to work in the UK
 - (d) a large number of people working for you listed as living at the same address may indicate high shared occupancy, often a factor for those being exploited
 - (e) agencies charging suspiciously low rates against standard industry pricing.

2. Responsibility for the policy

- 2.1 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.
- 2.2 The Group General Counsel and Company Secretary has primary and day-to-day responsibility for implementing this policy. This includes 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.
- 2.3 All managers are responsible for ensuring those reporting to them understand and comply with this policy. Those employees working in areas deemed to be of 'high risk' will be given adequate training on this policy and the issue of modern slavery in supply chains.

3. Compliance with the policy

- 3.1 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.
- 3.2 You have a responsibility 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.
- 3.3 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 or report it in accordance with our [Speak Out Policy](#).
- 3.4 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, the Ethics team or through our anonymous reporting service, in accordance with our [Speak Out Policy](#).
- 3.5 We 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 no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that any form of modern slavery is or may be taking place in any part of our own business or in any of our supply chains.

4. Communication and awareness of this policy

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all relevant individuals who work for us, and training will be provided as necessary.
- 4.2 Our commitment to preventing all forms of 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

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.