SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Lancashire Group is committed to the steps we have taken to combat slavery and human trafficking and we are committed to constantly reviewing and improving our practices to ensure it is not taking place in its supply chains.

The company expects the same high standards from all its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Our Policies on Slavery and Human Trafficking

Our Recruitment Policy reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our labour supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we monitor ethical standards across the business on a regular basis both internally and via external third party audits. As a B member of SEDEX we are subject to unannounced SEDEX Ethical Trade Audits as well as individual customer audits. Sedex reports are published and shared with our Customers.

Our Supply Chains

As a company we use Labour Providers to supply a percentage of our workforce. Each Labour Provider is audited against our own Labour Provider audit standard by trained auditors every 6-12 months. Within these audits, the ETI Base Code and controls around Modern Slavery are reviewed. We are also participating in the Fast Forward audit scheme.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff as part of their induction. Our HR team has attended the ‘Stronger Together – Tackling Modern Slavery in Supply Chains’ workshop and the Stronger Together data is shared across our sites during induction in order that both our permanent and temporary labour is fully aware of our commitment to preventing slavery and human trafficking in our business, and along our supply chain.
Raising Concerns

The Company aims to encourage openness and to support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith, their suspicion that modern slavery is or may be taking place in any of its businesses or supply chains.

Concerns should be raised directly to the HR Manager. In their absence, to a Senior Manager. Concerns will be investigated and if necessary, reported to the authorities for immediate action. Safety and confidentiality of any individuals is paramount and measures will be taken to protect vulnerable persons.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and / or are found to have been involved in modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th June 2017.

Veronica Cleary
Director