Modern Slavery Policy

1.0 Definition of Slavery

Slavery is where ownership is exercised over a person; servitude involves the obligation to provide services imposed by coercion; forced or compulsory labour involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily; human trafficking concerns arranging or facilitating the travel of another with a view to exploiting them.

The Company will ensure that it will comply with the Modern Slavery Act 2015 and is putting strict measures in place to ensure that no slavery is part of any of our business operations that includes our supply chains, goods and services.

The Company embraces socially responsible trading as part of SEDEX. We audit or require our suppliers to self-audit with an in depth questionnaire to ensure their production sites meet our very high standards and we work with customers to ensure optimum environmental friendliness. This will also extend to their employment practices and procedures to ensure that no slavery or human trafficking exists in their business.

Any recruitment agencies we use we will ensure that they have strict compliance to this Act and require confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking.

The Company has a Recruitment and Selection Policy that ensures compliance with equal opportunities and states that recruitment agencies used come from the Company’s Preferred Supplier Listing.

If it is established that any employee has committed an offence as follows:

- the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

They will be subject to the Company’s Disciplinary Process.

If a supplier is found to have committed the above then the Company will cease trading with them immediately and the Company will report them to the Police.
The Company will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

The Company has a Business Ethics and Integrity Code of Conduct policy for its employees to comply with.

2.0 Related Policies

- Business Ethics and Integrity Policy

The above list is not exhaustive and other Company policies may be applicable.

3.0 Where to find further information

If you require further information on this policy or procedure then please speak with your Manager in the first instance.

4.0 Policy Owner

This policy is owned and maintained by the Group HR Manager.

5.0 Policy Review Date

Date Last reviewed: February 2016

Date of Next review: February 2017