

Anti-Slavery and Human Trafficking Policy

It is our policy to take a zero-tolerance approach to any form of modern slavery which encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to ensuring effective systems and controls are in place to safeguard against any form of modern slavery taking place within our operations or in our supply chain.

We acknowledge responsibility to the Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Scotland) Act 2015, and we accept that we have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, and human rights laws and standards are being adhered to, including freedom of movement and communication, freedom of workers to terminate employment, freedom of association, prohibiting any threat of violence, harassment and intimidation, prohibiting compulsory overtime and discrimination.

All colleagues are provided with regular training and awareness of Modern-Day Slavery which includes the types of slavery that exist today. We will look at how to identify victims of slavery and what action can be taken.

We currently operate a supplier approval process which includes consideration of any risks of modern slavery or human trafficking, and all approved suppliers are required to demonstrate they meet our requirements to ensure that slavery and human trafficking is not taking place anywhere further down our supply chain. We will not have any dealings with any business knowingly involved in slavery or human trafficking.

This policy considers, and supports, the policies, procedures and requirements documented in our ISO compliant Management Systems and HR Procedures. The implementation and operation of which underlines our commitment to this policy including procedures to ensure that this policy, as well as all other company policies, is available and understood at all levels.

Our HR procedures include have the freedom to terminate employment, Our Security Screening Policy (PIP 29) builds in control measures to check for Right to Work, Confirmation of Address and Bank Accounts etc.

Any concerns about any form of modern slavery taking place within our operations or supply chain should be reported to management. This can be done anonymously through the Pointer Portal (Company APP). We have a whistle-blowing policy which is available to all colleagues.

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This policy will be reviewed as required to ensure its continuing suitability and relevance to our activities and is made available to all interested parties upon request. A copy is also available on the Modern Slavery Statement Registry Service hosted by gov.uk.

Approved By : Mr RA Rowan

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