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Modern Day Slavery

and Child Labour Company Statement

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Document History

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1 Modern Slavery

Modern Slavery is a serious and often hidden crime in which people are exploited for someone else's gain. The impact can be devastating for the victims.

Modern slavery can be defined as when an individual is exploited by others, for personal or commercial gain. Modern slavery in the UK can take many forms, including forced sexual exploitation, human trafficking, domestic slavery, forced labour, in construction, shops, bars, nail bars, car washes or manufacturing, All of these different forms are abuses of a person's freedoms and rights.

Modern slavery is a crime and a violation of fundamental human rights which is constituted in the Modern Slavery Act 2015. The company is a compliance specialist company with a clear, laser focus on FCA culture and conduct risk. Whilst is not legally required to have a modern-day slavery statement, the company working practices are in-line with the key principles of the act.

2 Child Labour

Child labour is defined by the International Labour Association as "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development". It refers to work that is mentally, physically, socially, or morally dangerous and harmful to children; and/or interferes with their schooling by:

- Depriving them of the opportunity to attend school;
- Obliging them to leave school prematurely; or
- Requiring them to attempt to combine school attendance with excessively long and heavy work.

Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. The answer varies from country to country, as well as among sectors within countries.

In the UK children are unable to work until they reach 13 and then certain restrictions apply for example part time hours, breaks etc. A young person must be in part-time education or training until they're 18.

3 Our Commitment

The company is committed to having effective systems and controls to ensure our working practices meet the required standards of the Modern Slavery Act 2015 and Children Act 1973.

We are dedicated to combat modern slavery and child labour and strive to ensure all our operations are conducted in an ethical manner and with integrity.

The company expects all employees and contract to act within the law and in line with the HR policies and procedures,

This policy is aimed at colleagues who could potentially witness indicators of modern slavery or child labour as well as our supply chain management process.

4 Policies and Processes

As part of the company commitment to eradicate slavery, human trafficking and child labour there are robust policies and processes in place. The company undertakes strict compliance checks on recruitment, including “eligibility to work in the UK”, passport/age and address checks, for all employees, to safeguard against child labour, human trafficking or individuals being forced to work against their will.

All employees and contractors have access to dedicated channels through which they may voice concerns either through local reporting mechanisms or through the whistle blowing procedures. The company is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation. The HR Policies and Procedures Manual also details the code of conduct and diversity, equity and inclusion policies and guidance.

5 Procedure

5.1 Identification

Whilst child labour could be identified through the right to work check during the recruitment process, there are several indicators that can be signs that someone is a victim of modern slavery. For the company, the indicators are likely to be at the recruitment or vetting stage for new employees or associates or through the supply chain process.

Sometimes it will be a case of acting on instinct that something is not right and using existing professional skills to talk to a potential victim and find out more information. None of these indicators in isolation or combination can give complete certainty, however it is not required to be certain to report any concerns.

5.2 Reporting

If modern slavery or child labour was suspected, the following actions should be undertaken:

- Phoning 999 if there is an immediate risk of harm.

If there is not an immediate risk of harm:

- Reporting to the police on 101.
- Modern Slavery Helpline on 08000 121 700
- National Society for the Prevention of Cruelty to Children (NSPCC) helpline on 0808 800 5000.

It is not required to be certain that modern slavery is taking place or fully understand the types and definitions to report any concerns.

5.3 Training

All employees and associates are expected to comply with all laws and act in accordance with UK guidelines and regulations and act with integrity and honesty.

All employees are issued with an employment contract informing them of both their contractual and statutory rights, such as holiday pay, sickness pay and any other benefits to which they may be entitled. All employees are paid at least the national living wage and we also ensure any recruitment or temporary staffing agencies that we use comply with all UK regulations and legislation.

Awareness of our policies is ensured through our induction programme for new joiners. All employees and associates are required to attest to the fact that they had read and understood the related policies and will uphold the standards required of them. We review and assess our corporate risk and regulatory training requirements annually.

Where a colleague requires additional information or support with regarding to human trafficking, forced labour, servitude, slavery or child labour this will be provided.

6 Supply Chains

The company aims to develop strong relationships with suppliers, based on mutual trust, understanding and respect. We have a zero-tolerance approach to modern slavery and child labour and as part of our Supplier Management Policy we conduct due diligence on our suppliers which includes legal compliance with local legislation including Modern Slavery Act and the Children's Act.

7 Monitoring & Compliance

This policy is part of the integrated management system, which adheres to UK legislation, is subject to internal audit and is externally audited as part of the ISO9001 (quality management), ISO27001 (information security management), ISO45001 (health and safety management) and ISO14001 (environmental management) certifications.

In line with our documents control policy, this policy is reviewed and approved on an annual basis or with a significant change.

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