Modern Slavery Policy

Applies to	All employees, workers, agency staff, contractors and volunteers
Policy owner	Chief Executive
Version	2.0
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Next review	20/07/2027

We are committed to acting ethically and with integrity in all our business dealings and relationships. We want to make sure that modern slavery and human trafficking play no part in our business or our supply chains.

Our annual turnover does not currently place us under a legal obligation to publish a modern slavery and human trafficking statement under the Modern Slavery Act 2015. Nevertheless, we are committed to the abolition of modern slavery and human trafficking in all its forms, and this policy sets out how we put that commitment into practice.

This policy does not form part of your contract of employment. We reserve the right to amend it.

1. What is modern slavery?

Modern slavery is not a historical concept - it exists today, including in the United Kingdom. It covers a range of serious exploitation, including holding a person in a position of slavery, servitude, or forced or compulsory labour, and human trafficking. What these have in common is that the person is unable to leave their situation because of threats, violence, coercion, deception or an abuse of power.

Modern slavery can occur at any point in a supply chain - from the sourcing of raw materials to distribution and in supporting services such as cleaning or catering. It can be difficult to spot, which is why awareness matters.

Signs that someone may be a victim of modern slavery include: appearing malnourished or unkempt, seeming fearful or reluctant to speak freely, not being in possession of their own identity documents, working excessively long hours, and appearing to be controlled by someone else. If you have any concern about anyone - inside or outside the business - please raise it.

2. Our commitments

We are committed to:

- conducting our business and our procurement activities with integrity and in a way that does not knowingly support or engage with any business involved in slavery or human trafficking
- assessing the risk of modern slavery within our business and supply chain and taking proportionate steps to address it
- ensuring that all those working for us have actively chosen to do so and are not being coerced or controlled in any way
- investigating all concerns raised about modern slavery promptly and seriously
- protecting anyone who raises a genuine concern in good faith from any detriment as a result

The Board is responsible for overseeing this policy and any updates to it. The HR Manager and all Directors are responsible for making sure that employment practices within the business support these commitments.

3. Supply chain due diligence

We recognise that the most significant risk of modern slavery to our business comes from our supply chain. We look at each aspect of our supply chain and assess risk proportionately. Where appropriate, we will ask suppliers to confirm that they have taken steps to address modern slavery in their own operations and supply chains.

If your role involves procurement - buying goods or services on behalf of the business - please apply the following due diligence questions before approving any new supplier:

Supplier due diligence checklist

- A questionnaire is issued to all new suppliers and reviewed annually.
- We will always ask "Does the company comply with the requirements of the Modern Slavery act?".
- We will ask for their documentation and within that we are looking for the following:
    1. Does the business trade with or operate in countries known to carry a higher risk of modern slavery?
    2. Does the business operate in a higher-risk sector (for example cocoa, cotton, tobacco, garments or electronics)?
    3. Is the supplier aware of modern slavery as an issue, and does it appear to take it seriously?
    4. Is the supplier willing to provide information about its own supply chain?
    5. Does the supplier monitor its own suppliers?
- If we find the answer to questions 1 and 2 is yes, or the answer to questions 3, 4 or 5 is no, we seek further guidance from a Senior Director before proceeding.

If asked to do so, you should assist with supply chain mapping - providing information about organisations you deal with, asking suppliers relevant questions on our behalf, or making introductions to key external contacts.

4. Your responsibilities

Everyone in the business has a role to play. We ask you to:

- read and understand this policy and take its aims seriously
- be alert to any signs of modern slavery or human trafficking in the course of your work - in the business itself, in our supply chain, or in any other context connected to us
- raise any concern promptly, using the process set out below
- avoid any conduct that could contribute to, or suggest, a breach of this policy

5. How to raise a concern

If you believe or suspect that modern slavery or human trafficking is taking place - in any part of our business or supply chain, or anywhere connected to our work - please report it as soon as possible using our Whistleblowing Policy.

If you are unsure whether something constitutes modern slavery, please discuss it with your line manager, a Director, Senior Director, the HR Manager or Graham North, Chief Executive. You do not need to be certain before raising a concern.

If your concern relates to a supplier, do not make any direct accusations or approaches to that supplier yourself. Follow the Whistleblowing Policy and let us handle it.

You will not suffer any detriment for raising a genuine concern in good faith. If you believe you have been treated unfavourably as a result of raising a concern, raise it under our Grievance Policy.

6. Breaches of this policy

Any breach of this policy - or conduct that works against its aims - will be treated as a serious matter and handled under our Disciplinary Policy. This may result in dismissal. For those who are not employees, we may terminate the relevant engagement.

7. Questions and administration

Graham North, Chief Executive is responsible for administering this policy. If you have any questions, please speak to your line manager in the first instance or contact grahamnorth@ansteyhorne.co.uk.

Related policies: Whistleblowing Policy - Grievance Policy - Disciplinary Policy

This policy does not form part of any contract of employment.