


CORPORATE DOCUMENT			
	Controlled		Effective Date: 03/2024
			Owner: Katie Hancock
Review Date:	03/2025	Related Docs:	Group Modern Slavery Statement Anti-Bribery Policy Whistle Blowing Policy Grievance Procedure
<b>Anti-Slavery and Human Trafficking Policy</b>			

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Anderselite (“we”) have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls designed to prevent modern slavery from taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific provisions in our standard terms of business to ensure compliance with this law and we expect that our suppliers will hold their own suppliers to the same high standards.

We shall ensure we provide freedom to colleagues to terminate their employment, freedom of movement, no threats of violence, harassment and intimidation, debt bondage, bonded labour and no obligation to work as a disciplinary measure or compulsory overtime.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy


The Directors and Group HR Director have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Safety & Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero- tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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Definitions

Human Trafficking is the process of arranging or facilitating the travel of another person with a view to exploitation. The offence can be committed even where the victim consents to travel; many victims believe they are being offered a better life. Exploitation could involve servitude, forced or compulsory labour, sexual exploitation, creation of indecent images or commercial dealings in bodily organs.

Modern slavery is the severe exploitation of other people for personal or commercial gain. Before it became impossible to own another person, the term ‘slavery’ referred to legally owning another person, as if they were a physical possession. Today, someone may behave as if they legally own a person, denying them their right to freedom this is still defined as slavery.

Forced or compulsory labour means that someone is forced to do work that they have not agreed to voluntarily, under threat of punishment. The individual could be controlled by a gang, their direct employer or an agency for commercial gain. The individual may be in debt bondage. This is where a person is tied to their employer, working in poor conditions and for very little, or no pay, whilst they pay back an unreasonable or unattainable debt.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.


You must notify your manager OR the Safety & Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must promptly notify your manager or the Safety & Compliance Manager or report it in accordance with the Whistle Blowing Policy as soon as practically possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Safety & Compliance Manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Safety & Compliance Manager or the HR Department

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immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

If any worker working for the organisation is identified as a victim of modern slavery; they will be provided with access to remedy, compensation and justice.

We prohibit the use of worker paid recruitment fees.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary and appropriate.

Our policy against modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Suppliers

Anderselite conducts checks on all suppliers before allowing them to become a preferred supplier. During the process, suppliers are required to confirm that:

- Their company has an active Anti-Slavery and Human Trafficking Policy
- There are measures in place to prevent any kind of forced labour or slavery
- They ensure its own supply chain have measures in place to prevent any kind of forced labour or slavery
- If they have encountered any Modern Slavery incidents within the last 5 years
- They pay their employees at least the national minimum wage / national living wage (as appropriate)

We may terminate the contract / agreement at any time should any instances of modern slavery arise.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Every employee has an individual responsibility to help meet the requirements of this policy. All are invited to contribute ideas for better practices, through their Manager or directly to myself.



Terry Naden  
Director

Date: 18/03/2024  
Anderselite Ltd (part of The Morson Group)

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**AMENDMENT RECORD**

Issue Amendments	Date	Issued by
Definitions added. Additional information added for victims of modern slavery. Prohibition of worker paid recruitment fees. Operations Director replaced with Directors. Rhys Harris replaced with Terry Naden. Amendments record added	March 2024	Katie Hancock