



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

This statement sets out [name of organisation]'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of [details of industry/sector], the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of [name of organisation]:

- [Give brief details of the organisation, the business activities it carries out, and the nature of its supply chain.]

Countries of operation and supply

The organisation currently operates in the following countries:

- [List countries or regions in which the organisation operates directly and give brief details of its operations there.]

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- [Describe the risk assessment process in relation to country operations and slavery and human trafficking.]

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- [List the organisation's activities at high risk and explain why they are high risk, describing the process through which the decision to place them at high risk was made.]

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows [select the relevant areas from the list below]:

- **Policies:** [Describe who is responsible for putting in place and reviewing policies and the process by which they were developed.]
- **Risk assessments:** [Explain the process and broad organisational responsibility for human rights and modern slavery risk analysis.]
- **Investigations/due diligence:** [List individuals or departments responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, and explain their specific role.]
- **Training:** [Describe broadly the training that has taken place either directly within the company, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.]

RELEVANT POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **[Supplier/Procurement] code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the

termination of the business relationship. [Describe the process and steps taken to implement the code of conduct in relation to slavery and human trafficking, including examples (not necessarily named) where action has been taken to address specific slavery and human trafficking risks.]

- **[Recruitment/Agency workers] policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. [Describe the process by which risks of slavery and human trafficking are addressed in relation to agency workers, including examples (not necessarily named) of instances where action has been taken as a result of the risk of slavery and human trafficking.]
- **[Any other policies relevant to the organisation's business or sector]** Organisations may have other relevant policies to which they can refer, for example a corporate social responsibility policy, which should be accompanied by the steps taken to implement the policy and any examples where it has been used to address slavery and human trafficking risks.]

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include [select the relevant actions from the list below]:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments [through [the organisation's own staff/third party auditor]], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers [through [third party auditor]] and requiring them to implement action plans [provide examples];
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular [provide examples such as participation in "Stronger together" or "Ethical trading" initiatives];
- using [details of ethical supplier database], where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and

- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship [provide examples].

PERFORMANCE INDICATORS

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is [select the relevant KPIs from the list below]:

- requiring [all staff/staff working in [specify countries]/supply chain managers/HR professionals] to have completed training on modern slavery by [date];
- developing a system for supply chain verification [in place since [date] / expected to be in place by [date]], whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains [completed on [date] / expected to be completed by [date]], whereby the organisation evaluates all existing suppliers.

TRAINING

The organisation requires [all staff/staff working in [specify countries]/supply chain managers/HR professionals] within the organisation to complete training on modern slavery [as a module within the organisation's wider human rights/ethics/ethical trade training programme].

The organisation requires [all staff/staff working in [specify countries]/supply chain managers/HR professionals] to [sign up to one of a number of training sessions that are being run in [time period]/complete an online training course by [date]].

The organisation's modern slavery training covers [select the relevant training areas from the list below]:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

AWARENESS-RAISING PROGRAMME

As well as training staff, the organisation has raised awareness of modern slavery issues by [distributing flyers to staff/putting up posters across the organisation's premises/circulating a series of emails to staff].

The [flyers/posters/emails] explain to staff [select the relevant issues from the list below]:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.