



# Modern Slavery Policy\_

Onboarding Documentation\_  
12/12/2023\_  
People Services\_

# Modern Slavery Policy

## 1. Introduction

- 1.1. 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 is not taking place within our business or its supply chains.
- 1.2. The *Modern Slavery Act 2015* places businesses of a certain size under a legal obligation to publish a slavery and human trafficking statement each year. These businesses also have to report on steps taken during the year to make sure that modern slavery and human trafficking is not taking place in any part of their businesses or supply chains.
- 1.3. Based on our global annual turnover, we are not currently legally required to publish a slavery and human trafficking statement each year. However, we are committed to the abolition of modern slavery and human trafficking. Our business undertakes appropriate due diligence to assess the risk of such issues arising both within the business and within its supply.
- 1.4. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5. **This Policy:**
  - a Explains the concept of modern slavery and human trafficking
  - b Sets out our commitment to being a business which is free from modern slavery and human trafficking and how we will achieve this
  - c Explains how you can help us to conduct our business free from modern slavery and human trafficking
- 1.6. This Policy applies to all those who work in the business, including employees, workers, agency staff, self-employed contractors and volunteers. Everyone working for us has a role to play in preventing modern slavery and human trafficking.
- 1.7. Please note that this Policy does not form part of any employee's contract with us. We reserve the right to amend or remove this Policy.

## 2. What is modern slavery?

- 2.1. Slavery is not something which is confined to the history books. Modern slavery exists in many forms, even here in the UK. It is rooted in the idea of forced labour – positions where a person is required to work and cannot refuse to work or leave because of

threats of violence, coercion or deception or abuse of power. It includes holding a person in a position of slavery, servitude, or forced or compulsory labour.

### **3. What are our commitments in this area and how will we work to achieve them?**

- 3.1. It is a priority for us that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.
- 3.2. The People are Culture team are responsible for making sure that all those working for us have actively chosen to work with us and are not being coerced or controlled in any way. They will do this through regular audits, an open appraisal structure and by following up on any concerns raised.
- 3.3. We recognise that the biggest risk of modern slavery within our business comes from the actions of those in our supply chain. We look at each aspect of our supply chain and assess the risk in each area. Where appropriate, we will require our suppliers to confirm that there is no slavery or human trafficking within their business or that of their suppliers.
- 3.4. We will take seriously all reports received raising concerns regarding modern slavery within our business and its supply chain, and we will investigate each one.

### **4. What are your responsibilities?**

- 4.1. You should take the time to read and understand this Policy and appreciate the importance of working with us on modern slavery and human trafficking issues.
- 4.2. If your job involves procurement (i.e. you obtain goods or services for us as part of your job role), then you should make sure you follow all appropriate protocols before approving any supplier. You should consider the following questions as part of any due diligence process:
  - a Does the business trade with or operate in countries that are a known risk for modern slavery (for example India, China, Pakistan, North Korea, Afghanistan, Eritrea or South Sudan)?
  - b Does the business operate in a sector which is high-risk for modern slavery (generally this will be the consumables industries, for example, cocoa, chocolate, tobacco and cotton)?
  - c Is the supplier aware of modern slavery, and does it appear to have the desire to address this risk?
  - d Is the business happy to provide information regarding its own supply chain?
  - e Does the business monitor its own suppliers?

f Are the staffing costs in line with what we would expect for the size of the business?

g Does the business have a whistleblowing policy in place?

The answers you receive to these questions can tell you a lot about the modern slavery risk posed by the potential supplier. You should seek further support from your manager if the answers to (a) or (b) above are 'yes' or if the answers to any of (c)-(g) above are 'no'.

4.3. You should avoid any conduct which might lead to, or suggest, a breach of this Policy.

4.4. You should, using the procedure below, raise a concern at the earliest opportunity if you believe that a breach of this Policy has occurred or if you have any wider suspicion of modern slavery in any part of our business or supply chains.

## **5. What to do if you have a concern**

5.1. If you believe or suspect that a breach of this Policy has occurred or that modern slavery or human trafficking may exist in a part of our business (or within our supply chains), then you should report your concern in accordance with our Whistleblowing Policy as soon as possible.

5.2. If you are unsure about whether something constitutes a breach of this Policy or indicates modern slavery or human trafficking, then we encourage you to discuss this issue with the People and Culture Team.

5.3. If your concern relates to the conduct of a supplier, then you should not make any direct accusations or approaches to the supplier yourself. You should act in accordance with the protocol for raising concerns set out in our Whistleblowing Policy.

## **6. Appropriate reporting and breaches of this Policy**

6.1. We will support all who raise genuine concerns in good faith under this Policy. We are committed to ensuring that you do not suffer any detrimental treatment in any form as a result of raising genuine concerns in good faith under this Policy. If you believe you have suffered unfavourable treatment, then you should inform your manager or consult our Grievance Policy.

6.2. If you are found to have acted in breach of this Policy or contrary to its aims and objectives, then we may take disciplinary action against you up to and including termination of your employment. If you are not an employee, then we may terminate any other form of engagement you may have with us.

## **7. Useful links and contacts**

7.1. Please refer to the Staff Handbook for copies of our Whistleblowing Policy and Grievance policy

a Whistleblowing Policy

b Grievance Policy

## **8. Administration of the Modern Slavery Policy**

8.1. The People and Culture Team are responsible for the administration of the Modern Slavery Policy. If you have any feedback, please contact [peopleservices@infinitygroup.co.uk](mailto:peopleservices@infinitygroup.co.uk)



## **We do *IT* differently\_**

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