



PORTERBROOK MANAGEMENT SYSTEM

LEG/T2/06

Anti-slavery and Human Trafficking Policy

Effective from: December 2022

Approval

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Revision History

Issue	Date	Pages	Details
Issue 1		All	New document
Issue 2	Dec 2019	All	Updated role titles
Issue 3	Dec 2022	All	Update to new procedure format; addition of reference to Government Guidelines and modern slavery statement register

This procedure is applicable to the following functions:

RISAS Applicable	<input type="checkbox"/>		
Commercial	<input checked="" type="checkbox"/>	Digital Technology	<input checked="" type="checkbox"/>
Finance	<input checked="" type="checkbox"/>	Strategy & Sustainability	<input checked="" type="checkbox"/>
Legal	<input checked="" type="checkbox"/>	Engineering Services	<input checked="" type="checkbox"/>
Public Affairs & Stakeholder Engagement	<input checked="" type="checkbox"/>	Human Resources	<input checked="" type="checkbox"/>

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1 Definitions

Term	Description
Compliance Officer	Head of HR
Porterbrook Group	Porterbrook Holdings I Limited and its subsidiary entities
Porterbrook Board of Directors	Directors of Porterbrook Leasing Company Limited

2 Policy purpose and scope

- 2.1 This Policy is deemed to cover all legal entities within the Porterbrook Group (“Porterbrook”, “us” or “we”).
- 2.2 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.
- 2.3 This Policy sets out the roles and responsibilities of Porterbrook in ensuring its compliance with the Modern Slavery Act 2015.
- 2.4 This Policy does not form part of any employee's contract of employment and may be amended at any time.

3 Safety

- 3.1 This Policy seeks to protect the safety of employees and workers in Porterbrook’s supply chain in seeking to prevent their exploitation and breaches of relevant labour laws in the manufacture or otherwise supply of goods and services procured by or offered by Porterbrook to its customers.

4 Responsibilities

Role	Responsibility
Porterbrook Board of Directors	Have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.
General Counsel	Has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Role	Responsibility
Managers	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.

5 Policy

- 5.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, bonded, 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. 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 to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 5.2 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 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.
- 5.3 Our Code of Practice, which is published on our website, is a voluntary code which contains our core values and business philosophy. We aim to provide our customers with a safe, reliable and efficient service whilst acting fairly and professionally. These values underpin our business and the way in which it operates and we consider that these values are wholly in line with our obligations under the Modern Slavery Act 2015. Our commitment to the Modern Slavery Act 2015 can be seen in our rigorous supplier accreditation process in which the risk of modern slavery is formally assessed.. Once a supplier is accredited we have the ability to monitor suppliers against our high standards contained within our Supplier's Code of Conduct, this process helps to ensure that we meet our disclosure obligations under the Modern Slavery Act 2015.
- 5.4 We will seek to comply, where relevant, with the UK Government's best practice guidance in respect of mitigating the risk of modern slavery, including maintaining Porterbrook's entry in the government's Modern Slavery Statement Registry.

6 Compliance with the Policy

- 6.1 All employees must ensure that they read, understand and comply with this Policy.
- 6.2 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.
- 6.3 You must notify your manager or the General Counsel as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future.

- 6.4 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.
- 6.5 If you believe or suspect a breach of this Policy has occurred or that it may occur you must notify your manager or the General Counsel or report it in accordance with our Whistleblowing Policy as soon as possible (a copy can be found on the intranet). You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 6.6 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, the General Counsel or in accordance with our Whistleblowing Policy.
- 6.7 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 General Counsel immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook, which is available on the intranet.

7 Communication and awareness of this Policy

- 7.1 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.
- 7.2 Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8 Breaches of this Policy

- 8.1 Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 8.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

9 Records

- 9.1 Records are to be retained in accordance with LEG/T2/05 Document retention Policy.

10 Competence

- 10.1 N/A - No specific engineering or safety competence required for procedure

11 Reference and related documents

Document No	Title
PERS/T2/03	Disciplinary Policy (Employee Handbook)
PROC/T2/16	Supplier Accreditation Policy
PBK/T2/05	Whistleblowing Policy and Procedure