




## PORTERBROOK BUSINESS MANAGEMENT SYSTEM

Procedure Reference: LEG-T2-06

Title: **Anti-Slavery and Human Trafficking Policy**

Procedure Owner: **General Counsel**

### Approval

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## Introduction

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.

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.

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 modern slavery is a topic of discussion and scoring. 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.

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.



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## Purpose

- 1.1 This Policy sets out the roles and responsibilities of Porterbrook in ensuring its compliance with the Modern Slavery Act 2015.

## Scope

- 2.1 The 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.
- 2.2 The 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.
- 2.3 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.

## Compliance with the Policy

- 3.1 All employees must ensure that they read, understand and comply with this Policy.
- 3.2 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.
- 3.3 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.
- 3.4 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.
- 3.5 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.
- 3.6 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.
- 3.7 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.



## Communication and Awareness of this Policy

- 4.1 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.
- 4.2 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.

## Breaches of this Policy

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

## Related Policies

### Policies & Procedures

Disciplinary Policy (Employee Handbook)

Supplier Accreditation Policy

Whistleblowing Policy & Procedure

### Reference

PERS-T2-03

PROC-T2-16

PBK-T2-05

## Records

- 6.1 Where there is a requirement to retain records as a result of a procedure, this shall be done in accordance with procedure LEG/T2/05 Record Retention Policy, a copy of which can be found on the intranet.

## Controlled hard copy distribution

7. The company policy is to hold procedures within the DMS/BMS electronically, unless otherwise stated in the procedure being written.

## Revision History

Issue	Pages	Date	Details
Issue 1	All		New document
Issue 2	All	Dec 2019	Updated role titles

