

4. 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.

5. 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.

Plans for the next year

Over the next 12 months we will continue to strengthen our approach to managing the risk of modern-day slavery within our business and supply chains. We also intend to carry out work in the following specific areas:

- Roll out training within our organisation to those who purchase services to make them aware of the Act and associated due diligence processes we have in place.
- Conduct a risk assessment of all our suppliers in terms of their country of origin and industry. This will enable us to identify suppliers who are located in high risk countries and industries of modern slavery.
- Maintain effective and continued focus on employee awareness of how we expect employees to conduct business responsibly, focusing on treating people fairly and equally, acting lawfully and the process involved to raise ethical concerns.

Board approvals

This statement is made pursuant to section 54(1) of the Act, has been approved by the Managing Director of Appetite for Business Ltd and will be updated annually in line with the Act's reporting requirements

Signed: 

Position: Managing Director

Date: 31st March 2019

ANTI SLAVERY & HUMAN TRAFFICKING POLICY

2.3 Staff 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.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you 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 the Managing Director 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 Managing Director as soon as possible.

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 Managing Director.

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

Tackling modern slavery – our people

To ensure that we recruit and treat employees fairly, avoiding modern slavery at all costs, our human resources (HR) policies set out our procedures on how we:

- recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates
- treat all employees fairly during their employment and, if there is an occasion when an employee does not feel that they have been treated fairly, there are procedures in place to raise a grievance or involve local trade union, where they exist, or where this is a legal requirement to do so
- manage the exit of an employee from the business in a fair and consistent manner.

Our Human Rights Policy details our commitments to labour and workplace rights. We provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements.

Our employees' pay will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry. Hours of work will be in line with local law or, in the absence of a law, the norm within that industry, and shall not be excessive. Employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis. Forced or compulsory labour is prohibited. Employees will not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited. The employment models deployed will be in line with territory-specific law and practices. Under these practices there will not be excessive use of alternative models, such as sub-contracting or labour-only contracting.

All staff are required to read and abide by our Ethical Code Statement, which details how employees can raise ethical concerns through our Open-Door Policy. Concerns about slavery and human trafficking would be considered to be an ethical concern and employees can raise these concerns openly and at any time in confidence.

2 RESPONSIBILITY FOR THE POLICY

2.1 The Managing Directory has 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 Managing Director 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. This policy is reviewed annually.

Date of issue: 31st March 2019

Date of next review: 31st March 2020

Owner: Managing Director

1. POLICY STATEMENT

- 1.1 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 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.
- 1.2 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.
- 1.3 As a business Appetite for Business Ltd strives to continuously improve and support our businesses to have effective oversight of our supply chain. All goods and services procured by Appetite for Business Ltd go through the Managing Director , who is responsible for assessing the suitability of the suppliers and ensuring the relevant due diligence checks are conducted.
- 1.3 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.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.