

## **Modern Slavery and Human Trafficking Policy**

### **Background and History**

Modern slavery is a crime and a violation of fundamental human rights. It takes forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Modern Slavery Act 2015 was aimed at combating slavery and human trafficking. Section 54 of the act defines the steps to take to ensure that such crimes do not occur within business or supply chains. The act applies to UK business with an annual turnover of at least £36 million.

Though we do not come under the requirements of the act, Coborn Engineering has a zero-tolerance approach to modern slavery within its business and supply chains. Preventing exploitation and protecting our workforce and reputation makes good business sense. We expect the same standards from all of our suppliers and we expect that our suppliers will hold their own suppliers to the same standards.

### **Definition of Modern Slavery**

The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Modern slavery could involve servitude, human trafficking, forced sexual exploitation, domestic slavery or forced labour on farms, construction, shops, bars, nail bars, car washes or manufacturing.

There is no typical victim and they may not understand they have been exploited and are entitled to help and support. The following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being instructed or coached by someone else
- They allow others to speak for them when spoken to directly
- They are dropped off and collected from work
- The person is withdrawn or they appear frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people

### **Responsibilities**

This policy applies to all employees, Directors, agency workers, volunteers, interns, contractors, external consultants, agencies, third-party representative, and suppliers. All employees and suppliers must comply with this policy. All employees and suppliers must report any incidence or suspicion of modern slavery.

The Board has responsibility for ensuring this policy complies with legal and ethical obligations. Turning a blind eye is unacceptable and simply not an option.

## What will we do?

- Ensure that all workers on site are safeguarded, treated fairly and with dignity
- Ensure employees have a written contract of employment
- Make appropriate checks to ensure employees are legally able to work in the UK
- Provide information to new recruits on their rights to sick pay, holiday pay and other benefits
- Ensure that employees are made aware of this policy and their obligation to comply with this policy
- Review our Anti-slavery Policy, at least every two years
- Provide information and/or training on any changes we make to the policy
- Have an open and transparent grievance process for employees
- Make it clear that we take our responsibilities in this policy seriously
- Listen and respond appropriately to anyone who raises a concern
- Remain alert to indicators of slavery
- Never turn a blind eye to any behaviours that could indicate a concern
- Report concerns if you suspect someone is being controlled or forced to work by someone else
- Encourage feedback to help us improve what we do to prevent people from being exploited
- Tell the companies we do business with that we do not accept any form of exploitation
- Identify areas where there is a higher risk of slavery

## At Risk Suppliers

We check that at-risk suppliers are supportive to the aims of this policy, (ideally have anti-slavery and policies) and ask them to complete an anti-slavery audit form.

We pay attention to those areas which have historically proven to be 'at risk'

- Outsourced activities such as cleaning, waste management
- Short term hire of low skilled labour
- Sourcing of raw materials from certain locations in the world
- Recruitment Agencies supplying industrial labour to the site - we check that;
  - Comply with the Modern Anti-Slavery Act 2015
  - Are not offering employees on temporary work visas (e.g. student or holiday visas)
  - Are free from ethical ambiguities
  - Are transparent, accountable and auditable