



## Anti-slavery and Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and 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 business relationships, consistent with our obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas and maintain a register detailing the same. We maintain a policy of employing a core group of our own staff but the seasonal nature of our business dictates that we must utilise staff supplied by third party agencies. We operate a policy of working with only use an agency (selected by competitive tender) that is licensed with GLAA and an accredited member of the Stronger Together network. We also randomly interview their staff using a standard GLAA approved questionnaire to check for indicators of modern slavery (see Appendix A).

We expect high standards from all of our agency partners and this process is a contractual term in our agreements with them.

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, 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.

### RESPONSIBILITY FOR THE POLICY

The management of the firm has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

The General Manager has primary and day-to-day responsibility for implementing this policy, but our HR Advisor provides assistance with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

### COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

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.

Although you should report any concerns regarding modern slavery and/or human trafficking in any parts of our business or supply chains, you are also encouraged to discuss a specific matter (or our policy or relevant legislation) with any member of the management team.



If you are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy, then err on the side of caution and report it to a member of the management department.

We encourage openness and will support anyone who raises genuine concerns in good, 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 knowledge, or suspicion, that modern slavery is taking place in any part of our business or in any of our supply chains.

#### COMMUNICATION AND AWARENESS OF THIS POLICY

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

#### BREACHES OF THIS POLICY

Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Margaret Bell  
General Manager  
February 2019



EXCELLENCE IN CO-PACKING

Appendix A

<b>Name of worker:</b>	
<b>Interviewed By</b>	

1. Who do you work for? .....
2. Do you travel to work in transport provided by your employer? Y/ N
  - If Yes:
    - Is it a mini bus? Y/ N
    - Do you pay for the transport? Y/ N
  - Is the money deducted from your wages? Y/ N
  - Have you given written consent for this money to be deducted? Y/ N
3. Do you live in accommodation provided by your employer? Y/ N
  - If Yes:
    - How much does your employer deduct from your wages for the accommodation? £.....  
per week or per month
    - Have you given written consent for this money to be deducted? Y/ N
4. Does your employer deduct anything from your wages other than Tax and National Insurance? Y/ N
  - If Yes:
    - Have your given written consent for this money to be deducted? Y/ N
    - What is the deduction for and how much do you pay?  
..... £.....
5. Do you have a contract of employment? Y/ N
6. How were you recruited and were you made to pay for getting the job?  
.....  
.....  
.....
7. Have you signed a form agreeing to work more than 48 hours each week? Y/ N
8. Have you been informed of your entitlement to?
  - Holiday pay Y/ N
  - Sick pay Y/ N
9. Are you in debt to your employer? Y/ N
10. Has your passport been retained by your employer? Y/ N
11. Do you have to pay for protective equipment? Y/ N
12. Are you paid regularly? Y/ N
13. How much are you paid per hour? £.....

Any other information:  
 .....  
 .....  
 .....