

ANTI SLAVERY / HUMAN TRAFFICKING POLICY

Introduction

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 in order to exploit them for personal or commercial gain.

Ken Burrows Ltd 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 within any part 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 subcontractors, suppliers and other business partners, and as part of our contracting processes, we will 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.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, managers, directors, agency workers, external consultants and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

WHAT IS SLAVERY?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. You may think this whole subject is irrelevant to us, but it is not.

At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

The Modern Slavery Act 2015 covers four activities:

❖	Slavery	Exercising powers of ownership over a person
❖	Servitude	The obligation to provide services is imposed by the use of coercion
❖	Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
❖	Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

IDENTIFYING SLAVERY

There is no typical victim and some victims do not understand that they have been / are being exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a victim of slavery or human trafficking.

- ❖ 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 outside their immediate environment.

Please note that this list is not considered to be exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or human trafficking.

Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

REPORTING SLAVERY

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with the Directors of **Ken Burrows Ltd** who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your line manager before taking any further action.

RESPONSIBILITY FOR THE POLICY

The Directors have equal and overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Directors hold the 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. Management at all levels throughout the company are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular information, instruction, and training on it and that they will raise the issue of modern slavery with our supply chain.

All of our employees and managers 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 Directors.

COMPLIANCE WITH THE POLICY

The Directors 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 chain 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.

You must notify the Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the Director.

Ken Burrows Ltd 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.

Ken Burrows Ltd 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 chain. 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 Directors immediately.

If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain, forms part of the induction process for all individuals who work for us, and regular information, instructions and training will be provided as necessary.

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.

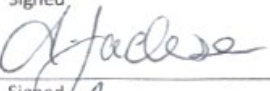
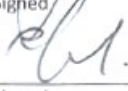

BREACHES OF THIS POLICY

In the event of an employee breaching this policy, the company will take the relevant disciplinary action and given the serious issues dealt with by this policy it should be noted that a breach of this policy will amount to Gross Misconduct, in which case the employee will be liable for summary dismissal without notice.

In the event that this policy is breached by a party who is not an employee then alternative appropriate action will be taken e.g. termination of the contractual relationship with the party who as breached the policy.

MONITORING OUR POLICY

We will review our Anti-Slavery Policy regularly, at least annually and we will provide Information, instructions and/or training on any changes we make.

Mr Tony Jackson Managing Director	Signed 	Date 25/04/23
Mr Richard Kirk Project Director	Signed 	Date 25/04/23
Mrs Sally Jackson Commercial Director	Signed 	Date 25/04/23

Prepared by:	Specialist Safety Solutions Ltd
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