

Anti-slavery Policy

Contents

| | | |
|-------|--|---|
| 1 | Purpose..... | 3 |
| 2 | Scope..... | 3 |
| 3 | Introduction | 3 |
| 4 | How is the MSA 2015 relevant to STG? | 3 |
| 5 | Responsibilities | 4 |
| 5.1 | The organisation | 4 |
| 5.2 | Managers..... | 4 |
| 5.3 | Colleagues..... | 4 |
| 6 | The risks..... | 5 |
| 7 | Our procedures | 5 |
| 7.1 | Anti-slavery statement..... | 5 |
| 7.2 | Supply chains..... | 5 |
| 7.3 | Recruitment Practices | 5 |
| 7.3.1 | Using agencies | 5 |
| 7.3.2 | General recruitment..... | 5 |
| 8 | Identifying slavery..... | 6 |
| 9 | Reporting slavery in the workplace | 6 |
| 10 | Training..... | 6 |
| 11 | Monitoring our procedures | 7 |
| 12 | Document Control..... | 7 |

1 Purpose

This policy is intended to ensure that Strategic Team Group (“STG”) and all its employees and service providers comply with the Modern Slavery Act 2015 (“MSA 2015”).

2 Scope

This policy applies to all STG employees. Any queries on the application or interpretation of this policy must be discussed with STG’s **Legal Director** prior to any action being taken.

All employees are required to adhere strictly to the terms and conditions of this policy.

3 Introduction

Modern slavery is a crime which results in an abuse of human rights. The MSA 2015 is a vital way of protecting communities and individuals across the globe.

The MSA 2015 covers four activities:

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|-----------------------------|--|
| 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 |

4 How is the MSA 2015 relevant to STG?

Modern slavery is a complex and multi-faceted crime and ensuring it does not take place in our organisation requires all of us to take action against it.

The MSA 2015 recognises the important part organisations can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- our supply chain
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality

5 Responsibilities

Our organisation, managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. This means that everyone needs to recognise and understand the complex issue of modern slavery and how we can ensure that it does not take place within our organisation or our supply chains.

Everyone must observe this policy and be aware that turning a blind eye is not an option.

5.1 The organisation

We will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- be clear about our recruitment policy (see Recruitment)
- check our supply chains (see Supply chains)
- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- ensure we have in place an open and transparent grievance process for all staff
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

5.2 Managers

Managers will:

- listen and be approachable to colleagues
- respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- remain alert to indicators of slavery (see Identifying slavery)
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- use their experience and professional judgement to gauge situations

5.3 Colleagues

You must:

- Be alert—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated within the organisation
- tell us if you think there is more we can do to prevent people from being exploited

6 The risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- supply chains
- recruitment through agencies
- general recruitment

As an organisation we manage these risk areas through our internal procedures, and as also set out in this policy.

7 Our procedures

7.1 Anti-slavery statement

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

We make this statement on our website.

7.2 Supply chains

We ensure that we check our supply chains to make sure the potential for slavery and human trafficking is significantly reduced.

We ensure the organisations and supply chains we work with do not accept any form of exploitation.

All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

7.3 Recruitment Practices

7.3.1 Using agencies

Our HR department follows firm policy and only uses agreed specified reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies.

This includes:

- conducting background checks
- investigating reputation
- ensuring the staff it provides have the appropriate paperwork (for example work visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- We keep agents on the list under regular review, at least every 3 years.

7.3.2 General recruitment

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

- We always ensure staff are legally able to work in the UK
- We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited)
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

8 Identifying slavery

Sometimes individuals do not understand they have been exploited and are entitled to help and support.

The following key signs are not exhaustive but could indicate that an individual may be subject to 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.

An individual may display a number of the trafficking indicators set out above but they may not necessarily be subject to slavery or trafficking. You will need to build up a picture of the individual's circumstances which may indicate something is not quite right.

If you have any suspicion, you must report it.

9 Reporting slavery in the workplace

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.

In other circumstances, you should discuss your concerns with STG's **Legal Director** who will decide a course of action and provide any further advice.

Not all individuals want to be helped and there may be instances where reporting a suspected trafficking case puts the individual at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with STG's **Legal Director** before taking any further action on their behalf.

10 Training

We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

11 Monitoring our procedures

We will review our Anti-slavery Policy regularly, at least **annually**. We will provide information and/or training on any changes we make. All service providers should be made aware of the STG Anti-slavery Policy and this Procedure and be asked to comply with them.

Should any employee have any concerns or queries in relation to the status of any perceived gifts or hospitality then the employee should discuss with STG's **Legal Director** or any of the STG Directors.

12 Document Control

| Issue no | Date of Update | Reason | Updated by |
|----------|----------------|-------------------------|------------|
| 1 | 01/05/2017 | Policy creation | A Poyner |
| 2 | 08/11/2018 | Review and minor amends | K Wesson |
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