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## Anti-Slavery and Human Trafficking Policy

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### **What this policy covers**

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

### **Our Commitment**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

### **Due diligence processes for slavery and human trafficking**

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

### **Training**

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined.

### **Our effectiveness in combating slavery and human trafficking**

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.

**Reporting suspicions of slavery**

Employees can report any suspicions of slavery either through the Company's Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://modernslavery.co.uk/contact.html>

0800 0121 700.

Managing Director	 John Pulsford Associates Limited	Date	3 <sup>rd</sup> January 2019
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