

# DANBRO

Accounting For Life



## Anti-Slavery And Human Trafficking Policy

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# Contents

## **Anti-Slavery And Human Trafficking Policy**

1.0 Policy Statement

2.0 Modern Slavery

3.0 Supply Chains

4.0 Responsibility For This Policy

5.0 Communication And Awareness Of This Policy

6.0 Compliance With This Policy

7.0 Breaches Of This Policy

## 1.0 Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, contractors, external consultants, third party representatives and business partners.

## 2.0 Modern Slavery

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. We 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.

## 3.0 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 contractors, suppliers and other business partners, and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

## 4.0 Responsibility For This Policy

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

We have appointed appropriate representatives from the following departments to assume day-to-day responsibility for implementing this policy, monitoring its effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery:

- Employment Business
- Human Resources
- Compliance
- Facilities and Procurement

## 5.0 Communication And Awareness Of This Policy

Training on this policy, and identifying risks within our business is provided to all our employees. We have also made this training available to all suppliers, contractors and business partners who are, or will be engaged with our business and actively encourage their participation.

## 6.0 Compliance 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 must notify us 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 also encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chain as soon as possible. You can do this by contacting either of the following as appropriate:

Trafalgar's Client Services Team on **0207 940 3090**

Danbro's HR Team on **01253 600 140**

The Confidential Modern Slavery Helpline on **0800 0121 700**

## 7.0 Breaches Of This Policy

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

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