

Group Modern Slavery and Human Trafficking Policy



Name:	Group Modern Slavery and Human Trafficking Policy
Venture:	All
Department:	All
Owner:	Director, Managed Services
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Issue Control, Revisions and Amendments

Each page of this document carries the document issue and page number. The document must always be re-issued as a whole.

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1.0	First Version	S Tarran	September 2016

Signed: 

Date: September 2016

Print Name: OLIVER RAISBECK

Company: First Response Training and Consultancy Services Ltd

Signed: 
On behalf of Spirit Ventures Ltd

Date: September 2016

1. Purpose

This policy is designed to articulate the group's position in regards to modern slavery and human trafficking.

Although we are not subject to Section 54(1) of the Modern Slavery Act 2015, we have voluntarily acceded to its conditions as an example of best practice, and as part of demonstrating our commitment to running a sustainable and ethical business.

2. Policy Statement

Modern slavery is a violation of fundamental human rights, and refers to debt bondage, forced labour and servitude. Any deprivation of a person's liberties for personal or commercial gain is regarded as slavery. Spirit Ventures is committed to combating modern slavery and human trafficking within our supply chain, and to implementing processes towards that objective.

3. Employee Responsibilities

- 3.1 All employees directly involved in sourcing suppliers or dealing with suppliers receive at least one hour of training on modern slavery and human trafficking.
- 3.2 All employees are encouraged to be vigilant for any signs of modern slavery and human trafficking, and are referred to SPV116 Whistleblowing Policy for details on how we are committed to protecting those who wish to report such matters.
- 3.3 This policy does not form part of an employee's contract and can be amended at any time.

4. Board Responsibilities

- 4.1 The responsibility for reviewing and amending this policy is the responsibility of the Strategic Board.
- 4.2 The Strategic Board reviews the group's modern slavery and human trafficking measures at its quarterly meetings as a standing item on the agenda.
- 4.3 The Strategic Board will produce an annual statement on modern slavery and human trafficking.

5. Related Policies

The following policies also contribute to our measures to combat modern slavery and human trafficking:

- 5.1 Whistleblowing Policy - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 5.2 Group Code of Conduct - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 5.3 Corporate Social Responsibility (CSR) Policy - The Company's CSR policy summarises how we work responsibly with suppliers and local communities.
- 5.4 Group Modern Slavery and Human Trafficking Policy – This Policy details our approach to identifying modern slavery and human trafficking in our suppliers.

6. Communication

- 6.1** This policy will be communicated to all new starters.
- 6.2** Staff members who hold relationships with suppliers are encouraged to make clear our stance on modern slavery and human trafficking to suppliers where it is felt to be relevant.

7. Breaches of the Policy

- 7.1** Breaches of this policy will be treated as a disciplinary matter and will be handled according to our disciplinary process.
- 7.2** Breaches of this policy may result in the termination of employment of the individual, or in the end of a relationship with an entity.