



## **MODERN SLAVERY POLICY**

### **1. POLICY STATEMENT**

- 1.1 It is our strict policy to conduct all our business in an honest and ethical manner and we take a zero-tolerance approach to modern slavery whether under UK law or under the law of any foreign country.
- 1.2 We are committed to acting ethically & professionally and with integrity in all our business dealings/relationships. Furthermore, we are committed to implementing effective systems and controls to ensure modern slavery is not taking place anywhere within our own business or with the supply chains of staff that we are associated with.
- 1.3 We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout supply chains, consistent with our disclosure obligations under the modern slavery act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.4 Modern Slavery is a crime and a violation of basic human rights.
- 1.5 We will uphold all laws relevant to modern slavery and corruption, including the modern slavery act 2015.
- 1.6 Unless stated otherwise, the interpretation of this policy applies to any modern slavery activity in the UK and any foreign country.

### **2. ABOUT THIS POLICY**

- 2.1 The purpose of this policy is to:
  - a) Set out our responsibilities and of those working for us and any third party, in observing and upholding our position on modern slavery.
  - b) Ensure that any introducers of new employees are not in breach of this policy and provide information to those working for us and any third party on how to recognise and deal with modern slavery issues.

2.2 If we fail to prevent those working for us and any third party facilitating modern slavery, we can face criminal sanctions, including an unlimited fine, as well as exclusion from public contracts, damage to our reputation and individuals can be imprisoned. We therefore take our responsibilities seriously.

2.3 We have identified that the following are particular risks for business:

- a) An introducer of new employees offer to source foreign candidates that do not have legal work permits;
- b) When we do not interview candidates face-to-face to work away from our main place of business
- c) We may be provided with fraudulent identification documents for candidates.

2.4 To address those risks we have taken the following steps:

- a) Our internal policies specifically prohibit the above;
- b) Our internal training processes specifically prohibit the above
- c) We undertake thorough due diligence identity and right to work checks and auditing is undertaken by our compliance manager.

2.5 In this policy, third party means an individual or organisation you or we come into contact with during the course of our business, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, public bodies, including their advisors and officials, politicians and political parties.

2.6 This policy does not form any employee's contract of employment and we may amend it at any time.

### **3. WHO MUST COMPLY WITH THIS POLICY?**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external contractors, external consultants, third-party business partners, sponsors, or any other person associated with us, wherever located.

#### **4. WHO IS RESPONSIBLE FOR THE POLICY?**

- 4.1 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.
- 4.2 The compliance manager has 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.
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 4.4 You 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 compliance manager.
- 4.5 The policy will be reviewed by the board at least on an annual basis to ensure it fully complies with our legal duties.

#### **5. WHAT IS MODERN SLAVERY?**

Modern slavery is a crime and violation of basic human rights. It takes various forms, such as slavery, forced and compulsory labour and human trafficking, all of which have in common, the deprivation of a persons liberty by another in order to exploit them for personal or commercial gain.

#### **6. WHAT YOU MUST NOT DO**

- 6.1 It is not acceptable for you for you to:
  - a) Engage in any form of facilitating modern slavery
  - b) Aid, counsel or procure the commission of a modern slavery offence by person;
  - c) Fail to promptly report any request or demand from any third party to facilitate modern slavery or any suspected modern slavery by another person.
  - d) Engage in any other activity that might lead to breach of this policy
  - e) Threaten against another individual who has refused to commit a modern slavery offence or who has raised concerns under this policy.

## **7. YOUR RESPONSIBILITIES**

- 7.1 You must ensure that you read, understand and comply with this policy.
- 7.2 The prevention, detection and reporting of modern slavery are 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.
- 7.3 You must notify the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if an employee or third party asks or in any way indicates they want us to employ a potential victim of modern slavery.

## **8. HOW TO RAISE A CONCERN**

- 8.1 You are encouraged to raise concerns about any issue or suspension of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage with the compliance manager.
- 8.2 If you become aware of or suspect modern slavery, with the welfare and safety of potential or actual victims as a priority, you must notify the compliance manager as soon as possible.
- 8.3 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 chains, raise it with the compliance manager as soon as possible.

## **9. PROTECTION**

- 9.1 Individuals who raise concerns or report wrongdoing, are sometimes worried about possible repercussions. We 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.
- 9.2 We are committed to ensuring no one suffers any detrimental treatment as a result of:
  - a) Refusing to take part in, be concerned in, or facilitate modern slavery activity by another person,
  - b) Refusing to aid or procure the commission of a modern slavery offense
  - c) Reporting in good faith their suspicion that an actual or potential modern slavery offence has taken place, or may take place in the future.

9.3 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 compliance manager immediately. If the manager is not remedied, and you are an employee you should raise it formally using our grievance procedure.

## **10. TRAINING AND COMMUNICATION**

10.1 Training on this policy forms part of the induction process for all staff that work for Apricus Resourcing and regular training will be provided as necessary.

10.2 We will ensure that mandatory training on this policy is offered to those employees workers and associated persons who have been identified as being at risk of exposure to modern slavery activity, at least once a year.

10.3 10.3 Our zero-tolerance approach to modern slavery activity must be communicated to all third parties at the outset of our business relationship with them and as appropriate after that.

## **11. BREACHES OF THIS POLICY**

11.1 Breaches of this policy by employees will result in disciplinary action under our disciplinary rules and procedures.

11.2 We may terminate our relationship with third parties working on our behalf if they breach this policy.