

# **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

Date: 7 February 2020

Reference: AFH

A F Howland Associates  
The Old Exchange  
Newmarket Road  
Cringleford  
Norwich  
NR4 6UF

Tel: 01603 250754

Fax: 01603 250749



## **Policy Statement**

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, all of which have in common the deprivation of a person's liberty, by another in order to exploit them for personal or commercial gain. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships. The Company implements and enforces effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.

The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. The Company expect the same high standards from all of its contractors, suppliers and other business partners, and as part of the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it expects that its suppliers will hold their own suppliers to the same high standards.

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

This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

## **Responsibility for the policy**

The Managing Director has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under its control comply with it.

The line 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.

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.

Staff 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 their line manager.

## **Compliance with the policy**

The Company will ensure that staff read, understand and comply with this policy

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for the Company or under the Company control.

The line manager must be notified as soon as possible if staff believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Staff are encouraged to raise concerns about the issue or suspicion of modern slavery in any parts of the company business or supply chains of any supplier at the earliest possible stage.

If staff believe or suspect a breach of this policy has occurred or that it may occur the policy requires to report it to management as soon as possible. Staff should note that where appropriate, and with the welfare and safety of local workers as a priority, the Company will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various form of modern slavery, they are to raise it with their line manager.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or maybe taking place in any part of the Company business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concern. If staff believe that they have suffered any such treatment then staff should inform their manager immediately.

### **Communication and awareness of the this policy**

The requirements of this policy, and the risk that the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Company, and regular updates will be provided as necessary.

This zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of the Companies business relationship with them and reinforced as appropriate thereafter.

### **Breach of this policy**

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

The Company will terminate the relationship with other individuals and organisations working on the Companies behalf if they breach this policy.



Dr A F Howland

Managing Director

7 February 2020