



Modern Slavery and Human Trafficking Procedure

FCAP030

Our firm is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chain, including sub-contractors, and staff.

Our firm acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within our organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within our firm.

Our firm currently only sources its products and goods from within the UK and EU.

As part of our organisation's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored by the director of our firm.

Our company will not support or deal with any business knowingly involved in slavery or human trafficking and the company director/s and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chain.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published.

This policy takes into account, and supports, the policies and procedures and requirements documented in our Quality Management System. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. This policy should be communicated to all levels of the company and it should be regularly reviewed by the director/s to ensure its continuing suitability and relevance to the company activities.

The aims of this policy will be communicated to new staff upon joining and at annual staff reviews.

The policy will be reviewed at least on an annual basis.

Last Updated: 8th May 2020

Review Date: 8th May 2021

This Policy has been approved and authorised by:

Name: Austin Barclay

Position: Managing Director

A handwritten signature in blue ink, appearing to read 'Austin Barclay', is written over a horizontal line.

Signed: