



Modern-slavery & human trafficking policy

1st April 2020 – 31st March 2021

<u>Version No.</u>	<u>Purpose/Changes</u>	<u>Approval Date</u>	<u>Approved By</u>	<u>Suggested Review Date</u>
V5.0	Annual update	8/4/2020	Group Common Board	March 2021
V4.0	Annual update	28/3/19	Ongo Partnership Board	March 2020
V3.0	Annual Update	29/3/18	Ongo Partnership Board	March 2019

Contents

		Page
1.	Our policy is...	2
2.	It applies to...	2
3.	Because we want to...	2
4.	We will...	3
5.	Making sure we do what we say...	4
6.	Other things to bear in mind...	4
7.	We'll look at this again...	5

1. Our policy is...

- 1.1 To have a zero-tolerance approach to 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, 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.
- 1.2 We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 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 standards from all of 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 or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. It applies to...

- 2.1 All areas of the Ongo Group and to our contractors, suppliers and other business partners.
- 2.2 All persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Because we want to...

- Ensure compliance with the requirements of the Modern Slavery Act 2015; and
- Be clear on what our approach to modern slavery and human trafficking is.

4. We will...

4.1 Do everything we can to ensure compliance with this policy.

- 4.1.1 All staff will be required to read, understand and comply with this policy.
- 4.1.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the 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.
- 4.1.3 You must notify the HR Team as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 4.1.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.1.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 4.1.6 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 constitutes any of the various forms of modern slavery, raise it with the HR Team.
- 4.1.7 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. We are 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 may be taking place in any part of our own business or in any of our supply chains. 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 a member of the HR Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

4.2 Communicate and raise awareness of this policy

- 4.2.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. The Policy and Statement is communicated to staff annually to ensure understanding and awareness of the subject.
- 4.2.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4.3 Breaches of this policy

- 4.3.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.3.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5. Making sure we do what we say...

- 5.1 The Group Common Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 5.2 The CEO will include the number of all new staff that have had awareness training on Modern Slavery and Human Trafficking and also how many cases of this we have had notified in the year in the annual compliance report to the Board.
- 5.3 The Director for Corporate and Compliance and the HR & OD Manager have 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.
- 5.4 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.

6. Other things to bear in mind...

- 6.1 This policy also links to our:
 - Transparency Policy
 - Procurement Policy and Procedures
 - Various HR Policies – including Whistleblowing

6.2 The main piece of legislation and regulation relevant to this policy is the Modern Slavery Act 2015.

7. We'll look at this again...

7.1 Each March along with the Modern Slavery & Human Trafficking Statement as it is a legal requirement to review, update and approve each financial year.