



# Anti-Slavery Policy

## Scope & Responsibilities

This policy sets out the responsibilities of Gradwell Communications and provides guidance for all staff, representatives and third parties to observe and uphold our position on anti-slavery and human trafficking in line with the Modern Slavery Act 2015. This policy will be monitored and reviewed regularly in line with the policy framework.

## Policy

Gradwell are committed to conducting business in a professional, ethical manner with integrity and fairness at the heart of everything we do.

We are bound by the laws of the UK, including the Modern Slavery Act 2015, and have a zero-tolerance and transparent approach to modern slavery in regard to all of our business activities, relationships and supply chain.

### **What is modern slavery?**

Modern slavery can be in 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.

It is a violation of fundamental human rights and a crime.

### **Who does it apply to?**

All staff, contractors, interns and third parties engaged to work with Gradwell have the right, in line with our policies, to be treated with respect whilst performing their contractual duties in the workplace.

Gradwell will never knowingly engage with or support business partners or suppliers that are involved with any form of slavery or trafficking, whether adult or children. We expect the same high standards and zero-tolerance approach with business relationships.

### **Reporting Slavery**

All staff, contractors, interns and third parties are responsible for supporting the detection and prevention of modern slavery. If you suspect a person is the victim of, or a business partner may be engaging in or supporting any form of slavery, please report immediately to a member of the Leadership Team.

If you are unsure, please seek guidance from your line manager or the Governance team.

All reported illegal activities will be investigated fairly and Gradwell will take every reasonable effort to protect a person reporting suspected incidents from detrimental repercussions.



### **Action we take**

Our internal procedures state that all parties engaged to work with Gradwell undertake appropriate training upon induction followed by periodic updates. Our internal auditing activities include assessing staff awareness, effectiveness and compliance with policies and where a non-compliance is identified, corrective action will be applied.

Following investigation, any person found to be acting or supporting illegal activities that are considered slavery will face disciplinary action and may be reported to the relevant authorities.

We reserve the right to audit business partners and our supply chain. If evidence of Modern Slavery is identified, Gradwell shall declare contracts void without detrimental effect and report to the relevant authorities.



**Document Owner and Approval**

The CEO is the owner of this document and is responsible for ensuring that this policy is reviewed in line with requirements of the business. Line managers are responsible for training.

A current version of this document is available to all members of staff on sharepoint.

This procedure was approved by the CEO on 17/03/20 and is issued on a version controlled basis. Current version approved by the CEO, Simon Curry on 17/03/20

Signed:

Date: 17/03/20

**Change History Record**

Issue	Description of Change	Approval	Date of Issue
1	First release – Jo Walter	PM	17/03/20