



MICHAEL LUPTON ASSOCIATES LTD.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT



Table of Contents

1. DOCUMENT CONTROL2

3. POLICY STATEMENT3

4. DEFINITIONS3

5. LEGISLATIVE FRAMEWORK3

6. RESPONSIBILITIES3

 6.1 MANAGING DIRECTOR 3

 6.2 MANAGERS..... 3

 6.3 EMPLOYEES AND CONTRACTORS 4

7. SUPPLIERS’ CODE OF CONDUCT4

8. MLA’S COMMITMENT4



1. Document control

Date	Version	Changes	Author
	01.00	First Issue	Nigel Denison

Latest issue signed off by:	Role	Date
Michael Lupton	Managing Director	

2. Policy governance

Who this policy applies to: All employees. If you are not directly employed by MLA (i.e., agency worker/contractor) this policy will still apply but may require some modification.

Equality & Diversity: We have made all efforts to ensure this policy does not have the effect of discriminating, directly or indirectly, against colleagues, service users, contractors or visitors on grounds of race, colour, age, nationality, ethnic (or national) origin, sex, sexual orientation, marital status, religious belief or disability.

Review period: This policy does not form part of employees’ contracts of employment and we may change it from time to time. This policy is reviewed on an annual basis or in accordance with any change in legislation or company policy.

3. Policy statement

MLA has a zero-tolerance approach to modern slavery and human trafficking in its operations and supply chain. The business is committed to acting ethically and with integrity in all business dealings and relationships. This includes implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the organisation or in any of its supply chains. To this end, the business is committed to assessing and managing risks, and ensuring our supply chain is transparent, resilient and free from modern slavery and corruption.

MLA seeks to work with suppliers that share its values and expects its suppliers to hold their own suppliers to the same high standards of compliance with this policy.

4. Definitions

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

5. Legislative framework

This policy is underpinned by the Modern Slavery Act 2015.

MLA's current annual turnover means that it is not under a commitment to publish a slavery and human trafficking statement (MSA statement) as required under Section 54 of the Act. The organisation is however committed to supporting the aims of the Act by taking responsibility for how its business is conducted, which includes mitigating the risks of modern slavery and human trafficking occurring within MLA's business and/or supply chain.

6. Responsibilities

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

6.1 Managing Director

The Managing Director is responsible for overseeing this policy and ensuring its effective implementation by MLA's managers and staff and all those associated with our business.

6.2 Managers

Managers are responsible for ensuring their staff have read and understood this policy and know how to report concerns. They are to provide their staff with annual training on the issue of modern slavery in supply chains, including how to identify warning signs, and the importance of reporting concerns promptly.

Managers are responsible for:

- Undertaking risk assessments for new suppliers and sub-contractors
- Checking ongoing compliance with this policy when visiting their premises and
- Reporting compliance outcomes in accordance with this policy back to the Managing Director.

6.3 Employees and contractors

All staff are responsible for ensuring that they have read and understood this policy and that they know how to report any concerns related to modern slavery.

Staff must notify their line manager as soon as possible if they believe or suspect that this policy has been breached or may be breached in the future. Staff should comply with MLA's Whistleblowing Policy if they feel unable to raise a concern with their line manager.

7. Suppliers' Code of Conduct

As a minimum, MLA requires its suppliers and contractors to:

- Comply with all applicable laws and regulations regarding employment practices, benefits, health and safety, modern slavery and anti-discrimination.
- Provide a workplace free of direct or indirect discrimination, harassment or bullying on the grounds of gender, age, race, nationality or ethnic origin, disability or other bias.
- Not use child labour or labour that is in any way forced.
- Pay fair wages in line with legislation and awards for the industry including adequate rest periods and leave.
- Treat those who work for or on behalf of its business with dignity and respect, promoting a safe environment.
- Oppose Modern Slavery in all its forms.
- Monitor their own supply chains on a continuous basis for compliance with the above requirements
- Promptly investigate any suspected non-compliance within its supply chain.

As part of MLA's commitment to act ethically and ensure compliance with the Modern Slavery Act 2015, MLA may from time to time ask its suppliers and contractors to demonstrate that they work in the ways required by this Suppliers' Code of Conduct.

The Finance Manager will ensure that this Code of Conduct is included within any new supplier's contract.

8. MLA's Commitment

MLA expects everyone working with or on behalf of its business to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Staff must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Anti-Slavery & Human Trafficking Policy

- We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.

REFERENCES

Relevant policies

- Whistleblowing Policy
- Supply Chain Management Policy

Relevant legislation

- Modern Slavery Act 2015