ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

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Background

Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are controlled by force, threat, coercion and/or deception. This is a violation of fundamental human rights and is not tolerated in our business or our supply chain.

Modern slavery can take many different forms including:

- Trafficking of people – the recruitment, harbouring or transportation of people for the purposes of exploitation.
- Forced labour – victims are forced to work against their will, under threat of punishment (e.g. violence, restriction of movement or confinement to the workplace, debt bondages, withholding of wages or excessive wage deductions, retention of identity documents, threat of denunciation to the authorities).
- Domestic servitude – victims are forced to work in predominantly private households, performing domestic chores and childcare duties.
- Criminal exploitation – the exploitation of people to commit a crime.
- Sexual exploitation – includes, but is not limited to, sexual abuse and forced prostitution.

Scope and responsibility

This policy applies to everyone that works for Simple Design Works Group Ltd or on our behalf (in any capacity). It explains our commitment to reduce the risk of modern slavery taking place in any part of our business or within our supply chains.

The directors have overall responsibility for ensuring this policy is updated and complies with our legal and ethical obligations, and that those under our control comply with it.

All managers will ensure that their teams are made aware of this policy. All employees are responsible for reading and understanding this policy, as well as cascading their concerns.

Our commitment

Simple Design Works Group Ltd complies with all applicable legislation, including the Modern Slavery Act 2015 and the Human Rights Act 1998. We respect the human rights of our employees and provide them with a safe working environment and fair terms of employment. We have a commitment to:

- Do all that we reasonably can to prevent all forms of modern slavery within any part of our business or our supply chains.
- Act ethically and with integrity in all our business dealings and relationships.
- Implement and enforce effective systems and controls.

1. Our workforce

During the recruitment stage, we show due diligence and good practice by:

- Only working with formal labour providers who are legitimate and registered business entities.
- Having clear T&Cs and scope of responsibilities with our labour provider.
- By providing full information to candidates about the role (i.e. by providing a job description and naming a point of contact for questions).
- By conducting desktop checks on prospective candidates (e.g. right to work in the UK, proof of name and address, social media).

Whether during recruitment, within our employment or as a contractor, we ask our employees to familiarise themselves with the following warning signs that might indicate something is wrong and needs to be reported:

- People who don't have written contracts of employment.
- People who have had to pay fees to obtain work.
- People who are not able to prove they are legally entitled to work in the UK.
- People who show signs of physical abuse and/or appear malnourished or unkempt.
- People who seem to have few personal possessions or often wear the same clothes.
- People who appear frightened or reluctant to talk to others.
- People who are dropped off or collected for work by the same person regularly, possibly very early or very late at night.
- A large number of people listed as living at the same address.
- Multiple people whose salary is being paid into the same bank account.
- Multiple people providing the same next of kin details.
- Agencies charging suspiciously low rates against standard industry pricing.

We create a good workplace environment by ensuring each employee is managed and that managers are encouraged to talk formally and informally to team individuals to ascertain if they are experiencing any issues. We have the Managing Director and Operations Director in leadership roles to support managers (in their management roles) and employees. We provide access to remedy by having transparent procedures that are operated fairly.

2. Third parties

We expect high standards from all our contractors, suppliers and other business partners. We expect them to comply with all applicable laws and regulations; we may terminate our relationship with individuals or organisations if they are found to be in breach.

We manage the risk by taking the following actions:

- We check Companies House to alert us to any financial or negative information of suppliers, clients and other business partners as part of our ongoing due diligence.
- We add key contacts to Google Alerts to alert us to online company news.
- We have established key contacts within our third party organisations so that a personal working relationship is developed and they understand our principles and culture in which we work, and expect from our business partners.
- We have evaluated our suppliers and categorised them.
- We have approved and not approved supplier lists.
- We encourage visits to business premises (ours and those of our business partners).
- Having dedicated individuals as a point of contact as well as reviewing and amending business practices that dovetail into this policy.
- Committing ourselves to the ISO 9001 accreditation and ensuring continuous improvement is evident throughout our organisation and its policies.

Speaking out

We will take any allegations that human rights have not been properly respected seriously. We encourage employees and third parties to speak up, without fear of retribution, about any concerns they may have. We will provide them with support, take their concerns seriously, facilitate an investigation and any related actions.

Employees should raise their concern with either their manager, the Operations Director or the Managing Director. Alternatively they can also contact the Modern Slavery Helpline (T: 0800 012 1700 or at www.modernslaveryhelpline.org/report) or (if they suspect someone is in immediate danger) call 999.