

# Modern Slavery and Human Trafficking Policy

# Modern Slavery and Human Trafficking Policy

## 1. Policy Statement

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another for personal exploiting or commercial gain. We have a zerotolerance approach to modern slavery and are committed to act ethically and with integrity in our business dealings to implement and enforce systems and controls to ensure modern slavery is not occurring in our business or in any of our supply chains.
- 1.2. We are also committed to ensure transparency in our 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 high standards from contractors, suppliers and other business partners. As part of our contracting processes, we include prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that our suppliers will hold their suppliers to the same high standards.
- 1.3. This policy applies to all persons working for us or on our behalf, including employees, directors, officers, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4. This policy does not form part of any employee's contract of employment and may be amended at any time.

## 2. Responsibility for the policy

- 2.1. The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that those under our control comply with it.
- 2.2. Line managers are responsible for ensuring those reporting to them understand and comply with this policy and the issue of modern slavery in supply chains.
- 2.3. Staff are encouraged to comment on this policy and suggest ways it might be improved. Comments and queries should be forwarded through their line manager.

## 3. Compliance with the policy

- 3.1. All management and staff must read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of our business or our supply chains is the responsibility of all those working for us or under our control who are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or in the supply chains of any supplier, at the earliest possible stage.
- 3.4. If you suspect a breach of this policy has occurred or may occur, notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.5. If you are unsure about whether any act, the treatment of workers generally, or their working conditions within our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.
- 3.6. We encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We will ensure that no one suffers detrimental treatment through reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you

believe you have suffered any such treatment, you should inform your line manager. If the matter is not remedied, you as an employee, should raise it formally using our Grievance Procedure.

#### 4. Communication and awareness of this policy

- 4.1. 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 employees.
- 4.2. Our zero-tolerance approach to modern slavery must be communicated to our suppliers, contractors and business partners at the outset of our business relationship and reinforced appropriately thereafter.

#### 5. Breaches of this policy

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

Signed:



David Bricknell  
Date: 25.05.2021

Managing Director, DO Interiors Ltd