



ISO 9001:2015 – 4.2 Centerprise Group Anti-Slavery and Human Trafficking Policy

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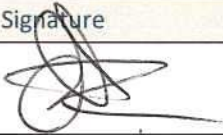

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COMPANY PROPRIETARY INFORMATION

Prior to use, ensure this document is the most recent revision by checking the Master Document List. To request a change, submit a Document Change Request to the Document Control Representative.

Approvals

The signatures below certify that this policy has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Chris Hunt		Group Quality Manager	08/01/2018
Approved by	Sam Lailey		HR and Support Director	8.1.18

Amendment Record

This Policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
1, Header, 3	Initial Issue	1	09/12/2016
	Review of policy, Removal of ISO 9001:2008 references	2	08/01/2018

Supporting documentation:

Ref	Title & Description	
QM001	Quality Management Manual	ISO 9001:2015
	Staff Handbook	

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Centerprise Group Anti-Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1 As an organisation who supports fairness, equality and diversity, we wholeheartedly welcome the introduction of the Modern Slavery Act 2015. 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in our all business dealings and relationships. We will not trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly.
- 1.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultant and third-party representatives and business partners.
- 1.3 This policy does not form any part of any employee's contract of employment and we may amend it at any time.
- 1.4 We review the risks that our supply chains can present. We expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation.

2. Responsibility for the Policy

- 2.1 The board of director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 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.
- 2.3 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR & Support Director This policy sets out Centerprise International Ltd commitment to its suppliers and customers by setting out the measures we are taking to ensure that we are acting in an ethical manner.

3. Compliance with the Policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains in 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.
- 3.3 You must notify your manager or the HR & Support Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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- 3.4 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.
 - 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
 - 3.6 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or HR & Support Director.
 - 3.7 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 the HR & Support Director immediately. If the matter is not remedied, and you are an employee, you 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 individuals who work for us and regular training will be provided as necessary.
- 4.2 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.

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 and organisations working on our behalf if they breach this policy.

