



## **Modern Slavery Policy**

### **Aims of this policy**

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, apprentices and any other third party representative.

We expect all who have or seek a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values. This will be via our public statement on our website.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

### **What do we mean by Modern Slavery?**

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

1. Slavery – where ownership is exercised over an individual
2. Servitude – involves the obligation to provide service imposed by coercion
3. Forced and compulsory labour – all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
4. Human trafficking – involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.
- All forms of modern slavery have in common the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

### **How we seek to embed our anti-slavery policy in practice**

To underpin our policy commitments, we are in the process of implementing the following measures over the course of the financial year.

- The Policy is available to all staff with guidance to raise any matters in connection with it to their line manager by way of the Company Grievance Procedure or Whistleblowing Policy.
- All Company policies are posted on our staff portal.
- This policy is to be incorporated in the Employee Handbook so that it is brought to new employees' attention when they start working for Risk Management Services (Chiltern) Ltd.
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- Risk Management Services (Chiltern) Ltd will inform our Contractors of the updated policy and Modern Slavery statement, providing them with a copy to ensure their compliance.

### **Responsibility for this policy**

The board of directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

All employees who suspect any members of the workplace being victim of modern slavery should notify their line manager and HR.

Risk Management Services (Chiltern) Ltd will make future steps to ensure sufficient communication and employee awareness training with regards to Modern Slavery.

All employees will be made aware of our Whistleblowing policy and procedure. The purpose of this procedure is to enable Risk Management Services (Chiltern) Ltd to thoroughly investigate allegations of any wrongdoing raised by employees within our Company without fear of reprisal.

### **Breaches of this policy**

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Managing Director.

### **Status of this policy**

This Anti-slavery policy will be reviewed by the Company's board of directors on a regular basis, at least annually.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

We will continue to review processes and adhere to current legislation.