

Modern Slavery Policy

Version Number	1.0
Document ID	HR195
Last Modified	17/12/20
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Owner	Claire Singleton
Approval Date	17/12/20
Approval Authority	Claire Singleton

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Version Control

Version	Change Description	Author	Date

Approvals

Version	Approver	Title	Date
1.0	Claire Singleton	Head of HR	17/12/2020

Distribution

Version	Name	Title	Date

1. Policy Statement

- 1.1. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of The Contact Company with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- 1.2. As a business, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

2. Steps for the Prevention of Modern Slavery

- 2.1. We are committed to ensuring there is transparency in our own 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 all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.
- 2.2. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:
 - a) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - b) engage with our suppliers both to convey to them our Modern Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;
 - c) introduce supplier pre-screening (for example as part of our due diligence process) and self-reporting for our suppliers on safeguarding controls;
 - d) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

3. Outsourced Recruitment Supply Chain

- 3.1. We expect our outsourced recruitment partners to ensure that all goods, materials, services, and labour are:
 - fully complicit with the Modern Slavery Act 2015,

- transparent and unambiguous,
 - accountable,
 - auditable,
 - and ethical.
- 3.2. We encourage our outsourced recruitment partners to read the Modern Slavery Act 2015, guidance information on relevant website (specifically ACAS and .gov.uk), and the historic publications from the Inter-Departmental Ministerial Group.
- 3.3. Any individual who suspects non-compliance from any of our outsourced recruitment partners should follow TCC reporting procedure detailed below.
- 3.4. Any person who undertakes work at TCC, whether directly employed or otherwise, will be made aware of the Company's Modern Slavery Policy and Statement and where to find it.

4. Goods and Materials Supply Chains

- 4.1. TCC does not produce materials or goods for sale or use.
- 4.2. We expect our suppliers, delivery partners, and any other organisations within our supply chain, to ensure that all goods, materials, services, and labour are:
- fully complicit with the Modern Slavery Act 2015,
 - transparent and unambiguous,
 - accountable,
 - auditable,
 - and ethical.
- 4.3. We endeavour at all times to engage with reputable and ethical suppliers of goods and materials.
- 4.4. We encourage our suppliers, delivery partners, and any other organisations within our supply chain, to read the Modern Slavery Act 2015, guidance information on relevant website (specifically ACAS and .gov.uk), and the historic publications from the Inter-Departmental Ministerial Group.
- 4.5. Any individual who suspects non-compliance from any of our suppliers, delivery partners, and any other organisations within our supply chain should follow TCC reporting procedure detailed below.

5. RESPONSIBILITY FOR THE POLICY

- 5.1. Ultimate responsibility for the prevention of modern slavery rests with The Board of Directors of The Contact Company. The Human Resources team has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.
- 5.2. Managers at all levels are responsible for ensuring those reporting to them:
- a) understand and comply with this policy; and
 - b) are given adequate and regular training on it and the issue of modern slavery

6. Reporting (Internal)

6.1. To report internally, available methods of contact are:

- 6.1.1. Via The Contact Company's Whistleblowing System via the Intranet;
- 6.1.2. Contacting the Human Resources team

7. Reporting (External)

7.1. To report externally, available methods of contact are:

- 7.1.1. By contacting the Human Resources team at hrhelpdesk@tcc.co.uk

Outputs

Understanding of TCC's stance on modern slavery

Review Date

Review Reference	Review Date	Comments
R01		