



# MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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VERSION 1.0 DECEMBER 2017



REED & MACKAY

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## POLICY STATEMENT

Reed & Mackay is committed to undertake due care and diligence to ensure that it conducts its business in accordance with its obligations under the Modern Slavery Act 2015 (MSA 2015). We recognise that in addition to a legal obligation by virtue of our turnover we have an ethical responsibility to support this Act and endeavour to ensure there are no Modern Slavery risks within our own business or our supply chains.

## POLICY COMPLIANCE

Reed & Mackay adheres to all current Modern Slavery laws and regulations and compliance is compulsory since any breach may result in a criminal offence punishable by law.

All staff are required to record and promptly report all suspicious activities to the Governance, Risk Management & Compliance department.

The Head of Governance, Risk Management & Compliance is responsible for reviewing any reported incidents and, if appropriate, reporting any suspicious activity.

All users are responsible for complying with this policy. Wilful or negligent disregard of this policy will be investigated and may be treated as a disciplinary offence. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

If you do not understand the implications of this policy or how it may apply to you, seek advice from the Governance, Risk Management & Compliance department.

## POLICY GOVERNANCE

The following table identifies who within Reed & Mackay is Accountable, Responsible, Informed or Consulted with regard to this policy.

**Responsible** - the person(s) responsible for developing and implementing the policy.

**Accountable** - the person who has ultimate accountability and authority for the policy.

**Consulted** - the person(s) or groups to be consulted prior to final policy implementation or amendment.

**Informed** - the person(s) or groups to be informed after policy implementation or amendment.

RESPONSIBLE	Commercial Director, Head of Governance, Risk Management & Compliance
ACCOUNTABLE	Chief Executive Officer
CONSULTED	Chief Financial Officer
INFORMED	All employees, all contractors, all other 3 <sup>rd</sup> party organisations with which Reed & Mackay work with

## REVIEW AND REVISION

This policy and Modern Slavery Act Statement will be reviewed as it is deemed appropriate, but no less frequently than annually.

Policy review will be undertaken by the Chief Executive Officer, Commercial Director and the Head of Governance, Risk Management & Compliance.

## PURPOSE

- To manage the risk of serious financial loss, loss of client confidence or other serious business impact which may result from a failure to prevent slavery within the business and supply chain.
- To set out Reed & Mackay's responsibilities and of those working for us, in observing and operating in a compliant manner.
- To provide information and guidance for those working with Reed & Mackay on how to identify and deal with Modern Slavery issues.
- To comply with all relevant regulatory and legislative requirements including the Modern Slavery Act 2015 and any other applicable laws.

## SCOPE

This policy applies to all Reed & Mackay employees, contractors and other 3<sup>rd</sup> party organisations with which Reed & Mackay does business with.

## DEFINITIONS

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.

The Modern Slavery Act 2015 came into force on 29 October 2015. It created additional criminal offences for those committing such acts, and had the intention of seeking to establish transparency in supply chains in modern commercial organisations.

Some of the Act's provisions include:

- Increasing the maximum sentence for the most serious offenders from 14 years to life
- Introducing two new civil orders to enable the courts to place restrictions on perpetrators (even before conviction)
- Adding mechanisms for seizing traffickers' assets

To avoid corporate liability, commercial organisations which meet defined criteria must prepare a slavery and human trafficking statement for each financial year which must be published on the website. The link to the statement must be visible on the home page or as part of a drop down menu on that page. The statement shall be approved by the board of directors and signed by a director.

## REED & MACKAY'S RESPONSE

Reed & Mackay are in scope due to supplying goods and services and having a prescribed turnover of over £36 million.

In accordance with section 54(1) of the Act, Reed & Mackay will prepare a slavery and human trafficking statement for each financial year. The statement will:

- Give a description of the steps we have taken to ensure that slavery and human trafficking is not taking place in its business and supply chain.
- Be approved by the Board of Directors
- Be published on the website in a clear and obvious place
- Be published within six months of the data of our financial year end

Reed & Mackay is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015.

As part of our risk management process, we have completed a risk assessment to consider any existing or future exposure. This remains an ongoing exercise.

We will review our purchases to understand the nature of our suppliers. These will include consultants and companies providing a wide range of goods and services to help us deliver our aims and objectives.

We will review how we engage with new suppliers and introduce a more robust onboarding procedure which considers Modern Slavery 2015 requirements.

We will create Supplier Operating Principles and communicate these to our suppliers and partners setting our expectations including adherence the suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.

We will introduce a new Supplier Compliance programme, enabling us to record the compliance of our suppliers and ensure that we challenge our supply chain to re-assert their compliance on an annual basis and where appropriate, will review contractual terms and conditions.

We will also, where appropriate and practical, visit our suppliers' offices, both in the UK and abroad. This will help us to become familiar with how they operate and what safeguards they have in place to reduce, remove and prevent the use of slave or forced labour in their organisations and their supply chains.

We will continue to have regular audits to check compliance with our policies and procedures.

We will make sure that our employees are aware of the Modern Slavery Act, of the definitions of slavery and human trafficking and that they know what to do should they suspect a case of slavery or human trafficking.

## RESPONSIBILITIES & RAISING CONCERNS

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all our people comply with it.

The Governance, Risk Management & Compliance and the Commercial & Product Development departments are responsible on a day to day basis for implementing this policy, but any staff member who procures on behalf of Reed & Mackay is required to provide assistance with reviewing risk profiles of suppliers and ensuring that procedures are implemented.

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is 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.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Reed & Mackay encourages openness and will support anyone who raises genuine concerns in good faith under this policy.

### AWARENESS & TRAINING

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Training and guidance will be provided to all relevant employees on how to identify and deal with transactions which may be related to these regulations via a specialist e-learning solution delivered via Reed & Mackay's Learning & Development department.

### MONITORING & REVIEW

The Governance, Risk Management & Compliance department are responsible for holding internal audits in order to help assess compliance.

### QUERIES

If you wish to discuss any matter relating to this policy, contact the Governance, Risk Management & Compliance department.