



## Modern Slavery and Human Trafficking Policy

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## 1 Purpose

risual's core values relate to acting in a manner which is ethical, respectful, transparent, inclusive and fair, challenging, confident, collaborative and professional. 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.

risual has a zero-tolerance approach to modern slavery and is 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 business or in any of our supply chains.

risual is also 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. The same high standards are expected from all of our contractors, suppliers and other business partners. Wherever practicable, risual will seek to include in our contracts with business partners specific prohibitions against the use of bonded, forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that all suppliers will hold their own suppliers to the same high standards.

## 2 Scope of Policy

For the purposes of this Policy "staff" refers to all persons employed by the risual.

The policy also applies to any other person associated with the University, who performs services for and on behalf of risual. This includes the risual's partners, preferred agencies, suppliers, sub-contractors, representatives, and other service providers. risual expects those persons to abide by this policy or have in place equivalent policies and procedures.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 3 Responsibility for Policy

This policy is adopted by risual's Board of Directors which has overall responsibility for ensuring that risual complies with its legal and ethical obligations. The Operations Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

#### **4 Compliance with the policy**

All staff must ensure that they have read, accept 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. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You should notify HR as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at any level of supply at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you should notify HR as soon as possible.

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 chains constitutes any of the various forms of modern slavery, raise it with your manager or HR.

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 HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### **5 Communication and awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

risual's 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.

#### **6 Breaches of this policy**

Any employee who breaches this policy will be subject disciplinary action, which could result in dismissal for misconduct or gross misconduct.

risual may terminate its relationship with other individuals and organisations working on our behalf if they are found to have breached this policy. risual will not knowingly support or deal with any business involved in slavery or human trafficking.