

# **Slavery and Human Trafficking Policy Statement 2017**

## **Background**

Section 54 of the Modern Slavery Act 2015 (the Act) requires commercial organisations with a total turnover of at least £36 million per year to prepare a slavery and human trafficking statement for each financial year of the organisation. The statement must set out the steps that the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Globestock Ltd has no statutory requirement to publish an annual statement but Directors have chosen to make clear their adherence to the principles enshrined within the Act.

This is not an annual statement but a broader statement to underline and make clear Globestock Ltd's stance on Modern Slavery and Human Trafficking and the steps Globestock Ltd take to ensure it is not party to such matters either directly or indirectly.

## **Introduction**

This statement sets out Globestock Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As a manufacturer, Globestock Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Globestock Ltd is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## **Organisational structure and supply chains**

Globestock Ltd supply chain covers suppliers of [INSERT MATERIALS ETC] both directly and indirectly from [INSERT WHERE MATERIELS COME FROM]. Up stream suppliers all have robust and published annual statements on Modern Slavery and Human Trafficking as required under the Act and we rely upon those annual statements to be a true reflection of individual vehicle suppliers Company and Board commitment to preventing slavery and human trafficking.

The indirect supply of materials and parts where no such statutory reporting requirements are required due to turnover or size of Company will also be asked to supply statements similar to this as produced by Globestock Ltd.

Other supply chain companies are predominately local and only provide specialist and technical services – all are know personally to the Directors of Globestock Ltd, with regular ongoing working relationships.

### *Countries of operation and supply*

Globestock Ltd only operates in the UK

### *High-risk activities*

There are no known high risk activities undertaken by Globestock Ltd

### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives rest with Directors of Globestock Ltd and will be advised by the retained HR Consultants and Group Accounts Office.

HR and Accounts will as appropriate advise or undertake risk assessments and or due diligence alongside the General Manager of Globestock Ltd.

Training for Directors of Globestock Ltd in anti Modern slavery and human trafficking prevention will be supplied by the retained HR consultants .

### **Relevant policies**

Globestock Ltd operates the following policies that alongside this policy describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through third party auditor which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular such as participation in "Stronger together" or "Ethical trading" initiatives;
- using SEDX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Performance indicators**

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is requiring Directors to have completed training on modern slavery by December 2016.

- developing a system for supply chain verification is expected to be in place by January 2017, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains which is expected to be completed by January 2017, whereby the organisation evaluates all existing suppliers.

### **Training**

As Globestock Ltd is a small business, modern slavery training will be predominately for Directors and senior staff covering such areas as:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;

- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **Awareness-raising programme**

As well as training, the organisation has raised awareness of modern slavery issues by putting up posters in the organisation's premises explaining:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

### **Board approval**

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**[Director's/Designated member's/Partner's] signature:**

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**[Director's/Designated member's/Partner's] name:**

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**Date:**

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***Document Date***