



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Introduction

As of October 2015, The Modern Slavery Act 2015 requires some commercial organisations to publish annual anti-slavery and human trafficking statements. Whilst not falling under the scope of this requirement, Peak42 are committed to improving our practices to combat slavery and human trafficking and as such, we have a zero-tolerance approach to modern slavery across all areas of the organisation, sub-contractors, partners and our supply chain.

We are committed to ensuring we are not connected in any way to modern slavery and will not support or deal with any business knowingly involved in slavery or human trafficking.

Purpose

Modern Slavery is a criminal offence under the Modern Slavery Act 2015 and can occur in many forms, including forced or compulsory labour or human trafficking. This policy aims to prevent opportunity for modern slavery to occur within our business or supply chain. Peak42 recognise that goods and services imported from outside the UK and EU are potentially more at risk for slavery / human trafficking issues.

Scope

This policy applies to all employees of The Company, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

Policy

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all our contractors, suppliers and other business partners. We expect our suppliers to hold their suppliers to the same standards. To underpin this, we intend to implement the following measures;

- Conduct risk assessments to determine which part of our business and which of our suppliers are most at risk of modern slavery. We can then focus on those areas.
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- Engage with our suppliers both to convey this policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business.
- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities, both routinely and at times of reasonable suspicion.

Responsibility

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Actions to report modern slavery or human trafficking

Whistleblowing Procedure, direct access to senior leadership; Peak42 have a whistleblowing procedure which is intended to provide guidance on how concerns can be communicated about suspected modern slavery associated with the Company or our suppliers. The nature of the matter reported will determine the Company's next course of action.

The Company encourages members of the public or people not employed by us to write to our head office to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

Safeguards

We aim to encourage openness and to support anyone who raises genuine concerns in good faith, even if mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting their suspicion that modern slavery may be taking place in any part of our own business or in any of our supply chains. The company will accept and take seriously concerns communicated anonymously.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

All employees including sub-contractors and agency personnel will be made aware of this policy annually and be expected to comply.

Relevant legislation


Modern Slavery Act 2015

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

<https://www.gov.uk/government/collections/modern-slavery-bill>

Review

Following its initial adoptions, this anti-slavery and human trafficking policy will be reviewed by the Board of Directors annually and may be amended from time to time. Our policy, 9300*045 is supported by the Board of Directors and the company Shareholders.

Signed for and on behalf of Peak42	Date	Next Review Date
 Director	01/07/19	30/06/20