



Anti-Slavery Policy

1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 Modern slavery is a complex and multi-faceted crime. At a basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. The MSA 2015 recognizes the important part businesses can and should play in tackling slavery and encourages them to do so.

1.3 With this in mind, we need to pay particular attention to:

1.3.1 our supply chain

1.3.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

1.3.3 cleaning and catering suppliers

2 Responsibilities

2.1 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and not an option.

2.2 The firm

2.2.1 We will:

- (a) maintain policies and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation
- (b) be clear about our recruitment policy (see Recruitment)
- (c) check our supply chains (see Supply chains)
- (d) have in place an open and transparent grievance process for all staff
- (e) seek to raise awareness so that our colleagues know what we are doing to promote appropriate welfare practices

Anti-Slavery Policy

- (f) make a clear statement that Subbytech take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

2.3 Managers

2.3.1 Managers will:

- (a) listen and be approachable to colleagues
- (b) remain alert to indicators of slavery (see Identifying slavery)
- (c) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do

2.4 Colleagues

2.4.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- (a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- (c) tell us if you think there is more we can do to prevent people from being exploited

3 The risks

3.1 The principal areas of risk we face, related to slavery and human trafficking, include:

- 3.1.1 some components of our supply chain
- 3.1.2 temporary service staff

3.2 We manage these risk areas through our procedures set out in this policy.

4 Our procedures

4.1 Anti-slavery statement

- 4.1.1 We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.
- 4.1.2 We make this statement on our website

4.2 Supply chains

- 4.2.1 We check our supply chain to reduce the potential for slavery and human trafficking.
- 4.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.
- 4.2.3 All our significant supplier contracts, for industries considered high risk, should contain an anti-slavery clause. This clause will ask suppliers and their employees to commit not to engage in slavery or human trafficking and to diligence their own supply chain.

Anti-Slavery Policy

4.2.4 We work to account for our supply processes—we know who is providing goods and services to us, including reviewing our significant suppliers' identity and level of risk in this area, and making efforts to confirm their adherence to anti-slavery measures in their businesses.

4.3 Recruitment

4.3.1 Using agencies

- (a) Our HR department follows firm policy and when needed, will only use agreed specified reputable recruitment agencies.
- (b) To reduce the potential for slavery and human trafficking, we will give due diligence on recruitment agencies before adding them to our list of approved agencies. This includes:
 - (i) investigating reputation and business practices
 - (ii) asking agencies to provide assurances that checks have been made
 - (iii) We keep agents on the list under regular review.

4.3.2 General recruitment

- (a) We will verify staff are legally able to work in the Subbytech office.
- (b) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

4.4 If, through our recruitment process, we suspect someone is possibly being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

5 Identifying slavery

5.1 There is no typical victim and some victims may not understand they have been exploited and are entitled to help and support.

5.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.

5.2.1 The person is not in possession of their own passport, identification or travel documents.

5.2.2 The person is acting as though they are being instructed or coached by someone else.

5.2.3 They allow others to speak for them when spoken to directly.

5.2.4 They are dropped off and collected from work.

5.2.5 The person is withdrawn or they appear frightened.

5.2.6 The person does not seem to be able to contact friends or family freely.

5.2.7 The person has limited social interaction or contact with people outside their immediate environment.

5.3 This list is not exhaustive.

Anti-Slavery Policy

5.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

5.5 If you have a suspicion, report it.

6 Reporting slavery

6.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

6.2 If you think that someone is in immediate danger, call the police.

6.3 Otherwise, you should discuss your concerns Paul McCaw (Subbytech Founder) who will decide a course of action and provide any further advice.

6.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Paul McCaw (Subbytech Founder) before taking any further action.

7 Training

7.1 We provide specific training to those staff members who are involved in managing recruitment and our supply chains.

7.2 More general awareness training is provided to all staff through induction training sessions, and e.g. regular electronic refresher alerts.

8 Monitoring our procedures

8.1 We will review our Anti-slavery policy regularly. We will provide information and/or training on any changes we make.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015

This statement is reviewed and approved by Subbytechs Founder Paul McCaw, whom has responsibility for ensuring its implementation.

Signed:



Title: Founder and Owner

Date: 6th October 2023