

# **POLICIES AND PROCEDURES**

**MODERN SLAVERY POLICY**

**Jan 2023**



## Table of Contents

1. Our Commitment.....	3
2. Rationale.....	3
3. Definitions .....	3
4. Requirements of Suppliers.....	4
5. Reporting .....	4
6. Actions .....	5

## 1. Our Commitment

At WAH we work in accordance with the Modern Slavery Act 2015 and as such, are committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. We maintain a responsibility to promote ethical and lawful employment practices. WAH will therefore, not knowingly use unlawful child labour or forced labour in any of the utilities and /or other commodities, products and /or services, nor will we accept commodities, products and /or services from suppliers that employ or utilise child labour or forced labour.

## 2. Rationale

Human trafficking and slavery are crimes under UK and international law. At WAH, we recognise that these crimes continue to exist in other countries in the world. This policy confirms our commitment to ensuring that human trafficking and slavery do not exist within our business, but also how we will make efforts to eradicate the same crimes from other businesses with who we maintain a relationship, especially from any supply chain). The WAH Head of Centre, Michael Allan who acts as the Senior Compliance / Anti- Slavery and Human Trafficking Officer and will take appropriate steps to ensure not only WAH compliance but also that these requirements are followed by our suppliers, subcontractors and business partners.

## 3. Definitions

All WAH suppliers will be required to adhere to the following:

- Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
- Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

## 4. Requirements of Suppliers

WAH Suppliers will:

- Not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Ensure that the overall terms of employment are voluntary, with the minimum age requirements prescribed by applicable laws.
- Compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Abide by applicable law concerning the maximum hours of daily labour.
- Not engage in any practice of slavery, servitude, forced labour, compulsory labour and / or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
- Ensure that any WAH sub-contractors or suppliers from whom they source goods and / or services for incorporation in those supplied to us, also adhere to these requirements.
- Ensure that certification is available from suppliers upon request to certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.
- Ensure that suppliers are able to demonstrate compliance with this Policy to our reasonable satisfaction.
- Understand and comply with periodic audits on this WAH Policy, suppliers are expected to fully co-operate.

## 5. Reporting

Reporting any breach of this Policy (including by a supplier) can be reported to WAH in confidence, if required, by contacting Head of Centre, Michael Allan, Senior Compliance / Anti-Slavery and Human Trafficking Officer. WAH will take any breach of this Policy extremely seriously and suppliers who are found to have been or are engaging in human trafficking and slavery or whom refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with WAH terminated immediately, without compensation.

## 6. Actions

If a supplier to WAH is found in violation of this policy, we will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier. It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

This policy statement will be reviewed annually and published. This Policy takes into account, and supports, the policies, procedures and requirements documented in our Internal Quality Management System.

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Reviewed: Annually

