



# ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

## POLICY STATEMENT

Modern slavery is a brutal form of organised crime that results in the exploitation of vulnerable workers. It takes a variety of forms including slavery, servitude, forced or compulsory labour, and human trafficking.

At Knights Brown we take a zero-tolerance approach to modern slavery. We are committed to acting ethically, with integrity and transparency in all our business dealings and relationships. We have effective systems in place and enforce controls to ensure modern slavery and human trafficking do not take place in our business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

We expect the same high standards of all of our suppliers, contractors and business partners and, as part of the contracting process, require them to confirm their commitment to complying with the Modern Slavery Act 2015.

We act responsibly to ensure those working on our behalf are not being exploited, are safe and that relevant employment, health and safety, and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for Knights Brown or on our behalf including employees, directors, officers, agency workers, agents, subcontractors, consultants, volunteers and business partners.

## RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations.

The commercial director is responsible for implementing this policy and for investigating allegations of modern slavery in the company's business and supply chain. Line managers are responsible for ensuring those reporting to them understand and comply with it.

System audits are used to ensure procedures are being followed and are effective in preventing or remediating the risk of modern slavery.

## COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of Knights Brown's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to a breach of this policy.

If an employee believes or suspects a breach of, or conflict with, this policy has or may occur, they must notify their line manager or report it in accordance with our Public Interest Disclosure Policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains as soon as possible.

Any employee who is unsure whether a particular act, the treatment of workers or their working conditions constitutes any of the various forms of modern slavery, is to raise it with their line manager. They may also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance.

Knights Brown encourages openness and will support anyone raising 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 or victimisation as a result of having reported in good faith, a suspicion that modern slavery is or may be taking place.

### TRAINING AND COMMUNICATION

Training on this policy and on the risks Knights Brown faces from modern slavery in our supply chains, will be provided to all appropriate staff, so that they know how to identify exploitation and modern slavery and how to report suspected cases.



KEVIN VALENTINE | MANAGING DIRECTOR  
OCTOBER 2020

Our zero tolerance approach to modern slavery is communicated to all suppliers, subcontractors and business partners whenever we enter into new or renew contracts with them.

### BREACH OF THE POLICY

Breach of this policy by an employee will result in disciplinary action and following further enquiry, may result in dismissal for gross misconduct.

Where a supplier, subcontractor or other business partner is found to be in breach of the Modern Slavery Act 2015, Knights Brown will report its findings and immediately terminate its commercial relationship with that organisation.