

# MODERN SLAVERY & HUMAN TRAFFICKING

## Policy and Procedures



## Table of Contents

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### Contents

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Table of Contents .....	2
Modern Slavery & Human Trafficking Version Control .....	3
Introduction.....	3
Application.....	3
Our Business.....	3
Responsibility .....	4
Our Policies.....	4
Due Diligence.....	5
Training .....	5
Our Performance Indicators.....	6
Awareness-raising Programme.....	6
Maintaining this Policy.....	7
Approval for this Statement.....	7

## Modern Slavery & Human Trafficking Version Control

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<b>Policy Lead</b>	HR HSEQ

## Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that SWTG has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SWTG has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Application

This policy is applicable to all employees at whatever level of the organisation's hierarchy, as well as sub-contractors who undertake activities on behalf of the organisation and any visitors to the organisation's premises. This policy and its mandatory application will be communicated to all employees, sub-contractors, visitors and interested parties.

As part of the organisation's induction process, new starters should be told about this policy and shown where it is located on the organisation's intranet. The HR HSEQ department is responsible for informing job applicants of this policy. Employees are responsible for informing their visitors to the premises of this policy.

## Our Business

This statement covers the activities of SWTG – a specialist in the design and manufacture of instrumentation for level, pressure, leakage management & winding temperature protection for the utilities sector in a diverse range of locations. Its supply chain is relatively short as most aspects of production and assembly are completed in-house. Operations are based in Devon, United Kingdom.

The company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking by evaluating suppliers against the following criteria:



## Responsibility

Responsibility for SWTG's anti-slavery initiatives is as follows

- Policies: The Senior Management Team is responsible for the implementation and review of anti-slavery initiatives, policies and processes.
- Risk assessments: Suppliers are required to provide evidence against the critical criteria set out above and a risk analysis is conducted by the senior management team
- Investigations/due diligence: The Senior Management Team are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- Training: New policies and processes are shared at least quarterly at staff meetings and new employees receive anti-slavery training as part of their induction. Refresher training is provided annually. Supplier training may be identified and implemented as part of the risk assessment process.

## Our Policies

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

**Whistle Blowing Policy:** SWTG encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, to the supply chains of SWTG. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. SWTG'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 the company's confidential disclosure form.

**Employee Code of Conduct:** SWTG's code makes clear to employees the actions and behaviour expected of them when representing SWTG. SWTG strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

**Supplier's Code of Conduct:** SWTG 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. SWTG works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

However, serious violations of SWTG's supplier code of conduct will lead to the termination of the business relationship.

**Recruitment policy:** SWTG 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.

**Corporate Social Responsibility Policy** SWTG is committed to aligning its business values, purpose and strategy with the needs of our clients, whilst embedding ethical principles into everything it does.

**Dignity at Work Policy** SWTG is committed to creating a work environment where everyone is treated with dignity and respect.

## Due Diligence

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

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments;
- Creating an annual risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans as appropriate;
- 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.

## Training

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SWTG requires all staff within SWTG to complete training on modern slavery. All new employees are required to attend the HR HSEQ induction training which includes a module on modern slavery and human trafficking.

SWTG's modern slavery training covers:

- The 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 SWTG;
- 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 SWTG should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from SWTG's supply chains.

## Our Performance Indicators

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SWTG has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, SWTG is:

- Requiring all staff to have completed training on modern slavery and thereafter attend annual refresher training
- Developing a system for supply chain verification, whereby SWTG evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains whereby SWTG evaluates all existing suppliers.

## Awareness-raising Programme

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As well as training staff, SWTG will continue to raise awareness of modern slavery issues by circulating bulletins.

The bulletins explain to staff:

- 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 SWTG; and
- What external help is available, for example through the Modern Slavery Helpline.

## Maintaining this Policy

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The Organisation will monitor the effectiveness of this policy and its general compliance within the Organisation.

This policy will be kept up to date and amended accordingly to reflect any changes in response to revised legislation and applicable standards and guidelines.

This policy is fully supported by the top management of the organisation. In support of this intent, the policy will be reviewed at least annually. The organisation will provide sufficient financial support and all other necessary resources for the full implementation of this policy.

## Approval for this Statement

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This statement was approved by the Board of Directors on 23 August 2017

Name	Mark Burnett
Signature	
Date	23 August 2017