	Anti-slavery and Human Trafficking Policy (UK)	Version No: 1.0	Approved by:
		Effective date: August 2021	Owner: Human Resources

Introduction

The PBE Group and its' associated subsidiaries (herein after referred to as the "Company"), is committed to fair employment practices and to following applicable employment law wherever it has operations. This includes complying with laws that prohibit child or forced labour, slavery, and human trafficking.

Purpose

This policy sets out the Company's requirements with regard to managing modern slavery risk in its operations and supply chains. It does not form part of an employment contract, contract for services or any other contract and may be amended at any time.


Applicable to

This policy applies to all persons working for or on behalf of the Company in any capacity, including directors, officers, employees, agents, consultants, independent contractors, and representatives of the Company's business partners. Failure to comply with this policy may result in disciplinary action or termination of a business relationship, as appropriate.

Policy statement

Modern slavery is a crime and a breach of fundamental human rights. It takes various forms, such as slavery, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and have voluntarily disclosed our commitment in this area to align with the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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Responsibility for this policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The COO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with this policy


The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or the COO as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the COO.

We aim to encourage openness and will support anyone who raises 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 as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the COO immediately. If the matter is not remedied, and you are an employee, you should raise it formally in accordance with the Company's Grievance Policy and Procedure.

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Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate on an on-going basis.

This policy is issued by way of guidance only. It does not form part of an employee's contract of employment or otherwise have any contractual effect. This policy may be varied, withdrawn, or replaced at any time by the Company at its absolute discretion.