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# Modern Slavery And Human Trafficking Policy

**Introduction**

Modern slavery is a serious crime and a grave violation of fundamental human rights, depriving individuals of their freedom, dignity, and liberty for the profit or benefit of others. In line with the UK Modern Slavery Act 2015, Trustseal Ltd is committed to combating all forms of modern slavery and human trafficking in our operations and throughout our supply chain.

**Our Commitment**

We require our directors, employees, and stakeholders to take a zero-tolerance approach to modern slavery and human trafficking. We are fully committed to understanding modern slavery risks relevant to our business activities and taking all necessary steps to prevent any instances of slavery or human trafficking within our organisation or supply chain.

**Scope**

This policy applies to all employees, contractors, consultants, suppliers, and any third-party entities involved in our business. This policy will be reviewed and updated annually or as needed to ensure continued compliance with UK legislation and best practices.

**Business and Supply Chain Overview**

Trustseal operates in [locations/countries of operation]. Our primary business activities include [describe business activities and services provided]. We are committed to building relationships based on integrity and trust with our suppliers and partners, emphasising ethical practices and respect for human rights.

**Risk Assessment Procedures**

To prevent and identify risks of modern slavery within our operations and supply chain, we undertake risk assessments focusing on:

- **Country Risk**: Evaluating individual country risks using resources like the Global Slavery Index.
- **Service/Industry Risk**: Analysing sectors where services or products may be at greater risk of modern slavery.
- **Demographic Factors**: Considering the presence of vulnerable or at-risk groups.
- **Current Data**: Reviewing reports and insights from human rights and labour organisations.

Based on these assessments, we identify, evaluate, and implement appropriate controls to mitigate risks effectively.

**Policies**

To support our commitment to combating modern slavery, we have implemented the following policies:

- **Whistleblowing Policy**: We encourage all employees, suppliers, and customers to report any suspected incidents of slavery or human trafficking in a safe and confidential manner, free from retaliation.
- **Business Ethics and Conduct Policy**: Our code of conduct requires all employees to maintain the highest ethical standards and comply with all anti-slavery and human trafficking policies.
- **Purchasing Code of Conduct**: Our purchasing code includes specific references to anti-slavery standards, which all suppliers are required to acknowledge and adhere to.

**Supplier Due Diligence**

We conduct due diligence on all new and existing suppliers, including:

- **Risk Assessments**: Evaluating risk based on the nature of services, geographic risk, and other risk factors.
- **Corrective Actions**: Requiring suppliers to address and improve any substandard employment practices or unsafe working conditions.
- **Sanctions**: Retaining the right to terminate relationships with suppliers who fail to meet our standards regarding slavery and human trafficking.

**Supplier Standards**

We require all suppliers to confirm compliance with the following:

- No use of forced, bonded, or involuntary labour.
- All work is voluntary, and employees have the freedom to terminate employment with reasonable notice.
- Each employee receives an employment contract, providing clear terms and reasonable notice for termination.
- Employees' wages are not withheld, and employees are not required to post bonds or deposits.
- No retention of passports, work permits, or other personal documentation as a condition of employment.

**Awareness and Training**

To raise awareness about modern slavery risks, we commit to the following:

- **Employee Education**: Providing training to employees at all levels to recognise signs of modern slavery and how to respond.
- **Supplier and Customer Engagement**: Distributing this policy to all suppliers and customers, outlining our anti-slavery standards and reporting requirements.
- **Induction Programs**: Including information about this policy in induction programs for new employees.

**Measuring and Reporting**

We assess the effectiveness of our efforts to combat modern slavery through the following indicators:

- **Training Completion**: Monitoring the completion rates of mandatory anti-slavery training among employees.
- **Supplier Compliance**: Tracking the number of suppliers completing our ethical compliance questionnaire.
- **Reporting and Investigations**: Recording any instances of reported concerns or suspicions of modern slavery to ensure timely investigation and response.

**Reporting and Remediation**

If any instance of modern slavery or human trafficking is identified in our operations or supply chain, we will act promptly to investigate, implement corrective actions, and report the findings to relevant authorities as required. We are committed to taking necessary remedial measures, including working with affected individuals and consulting external organisations where necessary.

**Continuous Improvement**

We recognise that the fight against modern slavery requires ongoing vigilance. We will regularly review our practices and policies to strengthen our commitment and adapt to emerging risks or regulatory changes. We remain dedicated to fostering a business environment where modern slavery and human trafficking have no place.