

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Mark Ingram 16th October 2023

**MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

1. **POLICY STATEMENT**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, 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 have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We are also committed to implementing and enforcing effective, transparent systems and controls to guard against modern slavery taking place in our own business or in any of our supply chains.

1. **WHO DOES THIS POLICY APPLY TO AND HOW DOES IT APPLY?**

This policy applies to all persons working for us or on our behalf in any capacity this includes: Our Employees (both temporary and permanent contracts) Interns, Consultants, Volunteers, Subcontractor and Freelance partners.

We expect our suppliers will hold their own suppliers to the same high standards outlined in this policy. Although this policy applies to all of our employees, it does not form part of our employee’s contract of employment however we reserve the right to amend this where appropriate.

1. **WHO IS RESPONSIBLE FOR THIS POLICY?**

Thriiver’s CEO has overall responsibility for this policy. Any queries or suggestions relating to this policy should be sent to [policies@thriiver.co.uk](mailto:policies@thriiver.co.uk)

1. **COMPLIANCE WITH THIS POLICY**

You must ensure that you read, understand and comply 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 on our behalf.

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

You must notify your line manager, your Thriiver contact and/or send an email to [policies@Thriiver.co.uk](mailto:policies@Thriiver.co.uk) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. Alternatively, if you are a Thriiver employee, where appropriate, you can report any such concerns in accordance with the Thriiver **Whistleblowing Policy** available to all members of staff.

If you need any assistance, you may also write to [policies@thriiver.co.uk](mailto:policies@thriiver.co.uk).

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 that 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.

If you believe that you have suffered any such treatment, you should send the details to [policies@thriiver.co.uk](mailto:policies@thriiver.co.uk) immediately. If the matter is not remedied, and you are a Thriiver Employee, you should raise it formally using Thriiver’s **Grievance Procedure** available to all members of staff.

If you need any assistance you can write to [policies@thriiver.co.uk](mailto:policies@thriiver.co.uk) .

1. **COMMUNICATION AND AWARENESS OF THIS POLICY**

Awareness of this policy forms part of the induction process for all individuals who are employed by us. Further training on the risks that Thriiver faces from modern slavery will be provided as appropriate. Our zero-tolerance approach to modern slavery should be communicated to all persons working for us or on our behalf in any capacity at the outset of the relationship and then reinforced if appropriate thereafter.

1. **BREACH OF THIS POLICY**

Breach of this policy may:

1. In the case of Thriiver Employees, result in disciplinary action up to and including dismissal;
2. In the case of individuals who are not Thriiver employees, result in termination of any contract that they may have in place with Thriiver and/or termination of their access to Thriiver.
3. **AMENDMENTS TO THIS POLICY**

This policy will be kept under review by our head of operations.

Where appropriate we reserve the right to revise, update and publish the revised the policy in line with modern slavery legislation.

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| ***Definitions:***  *For the purposes of this policy, the following definitions shall apply:*  *Thriiver: Thriiver Ltd, a company incorporated and registered in England and Wales, with company number 03415976 and with registered office at The Courtyard, Holmsted Farm, Staplefield Road, Cuckfield, West Sussex RH17 5JF.*  *Thriiver Employee: Any person working for Thriiver under a contract of employment* |



J M M Ingram – Commercial and Operations Manager

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