

### Anti-slavery and Human Trafficking Policy

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

#### **Policy Statement**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agents, contractors and suppliers.

Spicer Consulting Limited strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain.

#### **Commitments**

We are committed to implementing systems aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

We operate a number of internal policies to ensure that we are conducting business in an ethical manner. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees, to safeguard against human trafficking or individuals being forced to work against their will. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

#### **Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.



Denis F Spicer (Director)

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