

POLICIES AND PROCEDURES

Anti-Slavery Policy Statement

Policy statement

- Northwood Medway commits to developing and adopting a proactive approach to tackling hidden labour exploitation.
 - Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management.
- It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

Coverage

- This document applies to all Northwood Medway premises.
- The Managing Director is ultimately responsible for the monitoring & compliance of this policy.

Policy Commitments.

Northwood Medway shall:

- Designate appropriate managers to attend Modern Slavery training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third party labour exploitation and signs to look for.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters and Labour Abuse Authority and police.
- Provide information on tackling "Hidden Labour Exploitation" to our workforce as appropriate.
- Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.

We are committed to ensuring that all our workers' rights are protected and that they benefit from good labour standards.

Northwood Medway Ltd

t/a Current Force

We support and commit to ensuring that all employees of Northwood Medway are protected from labour exploitation, Modern Slavery and human trafficking and that these practices have no place in our business. We can confirm that we comply with the **ETI Base Code** which stipulates that:

The fundamental rights of workers are protected. Namely,

- a. Employment is freely chosen
- b. Freedom of association and the right to collective bargaining are respected
- c. Working conditions are safe and hygienic
- d. Child labour shall not be used
- e. Living wages are paid
- f. Working hours are not excessive
- g. No discrimination is practiced
- h. Regular employment is provided
- i. No harsh or inhumane treatment is allowed

A copy of the Policy Statement may be forwarded to customers, etc. if requested to do so.

*Additional copies of the Policy Statement are available on request from
Northwood Medway Ltd*
