



POL24: Modern Slavery and Human Trafficking Policy – Worldwide Trading Ltd

1. Vision and Values

1.1 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.

1.2 The business has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

1.3 The business is also committed to ensuring there is transparency in all its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from all of the businesses contractors, suppliers and other business partners. Wherever practicable, the company will seek to include in its contracts with business partners specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that its suppliers will hold their own suppliers to the same high standards.

2. Scope of Policy

2.1 This policy applies to all persons working for the business or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Responsibility for Policy

3.1 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.

3.2 Comment is invited on this policy and suggestions on ways in which it might be improved. These are encouraged and should be addressed to Management

4. Compliance with the policy

4.1 All staff must ensure that they read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for or under



company's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 All staff must notify your manager, as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

4.4 All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains at any level of supply at the earliest possible stage.

4.5 If a member of staff believes or suspects a breach of this policy has occurred or that it may occur they must notify their manager or report it.

4.6 If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of the company's supply chain(s) constitutes any of the various forms of modern slavery, this must be raised with the respective line manager or the Chief Procurement Officer.

4.7 The company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

4.8 The company is 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 its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they must inform the HR manager immediately. If the matter is not remedied, and they are an employee, it must be raised formally using the company 'Grievance Procedure' which can be found in the company HR policy document

5. Communication and awareness of this policy

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

5.2 The company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 The company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.