

# Modern slavery policy

This statement is made in regards to s.54 of the Modern Slavery Act 2015 and sets out the steps that Termination Technology Ltd is taking to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour, 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 Termination Technology Ltd has a zero tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

## **Our suppliers**

Termination Technology Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence assessments of all suppliers before allowing them to become a preferred supplier. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage

## **Compliance**

All employees must 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 under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager of the non-compliance as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If any employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their manager or a director.

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 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes they have suffered any such treatment, they should inform their manager immediately. If the matter is not remedied, they should raise it formally using our Grievance Procedure.

### **Communication and awareness of this policy**

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

### **Breaches of this policy**

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

We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



**Termination  
Technology Ltd**

*Quality and Service*

Chris Prosser  
Director

Signed:

Date: 02 November 2018