

## **1 POLICY STATEMENT**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms including but not limited to slavery, servitude, forced and compulsory labour and human trafficking. All these forms have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy applies to people working for us, external consultants, business partners and suppliers.

The principle legislation is the Modern Slavery Act 2015 and this policy together with D&D London's modern slavery statement is our compliance with s54 of that law.

## **2 RESPONSIBILITY**

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

Our Purchasing Director, with the support of our People Director, has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

## **3 COMPLIANCE WITH THE POLICY**

The prevention, detection and reporting of modern slavery in any part of our business and/or supply chain is the responsibility of all those working for us or within our control.

We aim to make sure that all existing supplier contracts are amended to contain anti-slavery and human trafficking commitments during the financial year 2017/18 and will provide for this provision in all new supplier contracts effective from April 2017.

Our aim is to conduct a sample of yearly risk assessments in those areas of our business where we have identified that the risk of modern slavery is highest.

We aim to encourage openness and visibility and will support anyone who raises concerns in good faith even if it transpires that they were mistaken.

## **4 COMMUNICATION**

This policy will be included in the employment policies together with a summary statement in the employee handbook, contracts of employment and consultancy agreements. It will form part of our onboarding process and training will be provided as necessary.

## **5 BREACHES OF THIS POLICY**

Any breaches of this policy by employees could result in disciplinary sanctions including summary dismissal and reporting to external bodies responsible for law enforcement.

Where modern slavery is identified, we will try to support our business partners and/or suppliers to carry out remedial measures. We may terminate our relationship with individuals and/or organisations working on our behalf if they do not enter into a remedial process and are found to be in breach of this policy.

## **6 INTERACTION WITH OTHER POLICIES AND PROCEDURES**

This modern slavery policy interacts with the following employment policies which can be obtained from HR and you should familiarize yourself with the contents:

- Recruitment policy
- Equal Opportunities and Dignity at Work policy
- Whistleblowing policy
- Corporate Social Responsibility policy
- Code of Business Conduct and Ethics (which includes our anti-bribery policy)
- Employee handbook

If you have any queries please consult your HR Business Partner.

## **7 PERIOD OF REVIEW**

D&D London takes compliance with the Modern Slavery Act seriously and we have an approach of continuous improvement. We will therefore review our anti-slavery and human trafficking systems on an annual basis or as required to make sure that they reflect any legislative changes together with current best practice, and will update them as required.