

MODERN ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY

Introduction

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.

Purpose

Bondelivery is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include 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 our suppliers will hold their own suppliers to the same high standards.

Scope

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

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, contractors, external consultants, third-party representatives, business partners, customers and suppliers.

Personnel Responsible for this Policy

The **Managing 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.

The **Human Resources Manager** has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Human Resources Manager.

Compliance of this policy

- a) You must ensure that you read, understand and comply with this policy;
- b) 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy;
- c) You must notify your manager or the Human Resources Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future;
- d) You 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;
- e) If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager, Human Resources Manager or report it in accordance with our Whistle-blowing Policy as soon as possible;
- f) You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- g) If you are 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, raise it with your manager or Human Resources Manager;
- h) 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 you believe that you have suffered any such treatment, you should inform your manager or Human Resources Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Individual Grievance Procedure which can be found within the Company Handbook or be requested from the company Human Resources Department.

Communication and awareness of this policy

- a) 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;
- b) Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Consequences of a Breach of this Policy

- a) **Company Employees** – an investigation will be carried out in accordance with the company Disciplinary Policy and Procedure and without reservation will be regarded as gross misconduct, which may result in summary dismissal;
- b) **Non-employees** – will be barred from the site/vehicle and referred to their own employer as appropriate
- c) **Other individuals/organisations working on our behalf** – we may terminate our relationship with immediate effect.

Steps taken to prevent slavery within our business and supply chains:

- a) Modern Anti-Slavery and Human Trafficking Policy issued to Bondelivery NI Limited employees;
- b) Prior to employment with Bondelivery NI Limited all individuals must in accordance with Home Office requirements prove that they are entitled to work in the United Kingdom;
- c) An application for an AccessNI check is required in the event of an individual being offered a position with Bondelivery NI Limited;
- d) Bondelivery NI Limited is registered as a 'Responsible Body' which enables the organisation to conduct the required identification checks on potential employees, and countersign applications for Basic Checks;
- e) Bondelivery NI Limited engages only specified, reputable recruitment and employment agencies to source labour and always verifies the accreditation and practices of any new agency it is using before accepting workers from that agency;
- f) Modern Anti-Slavery and Human Trafficking Policy issued to agency staff via respective recruitment and employment agencies;
- g) Bondelivery NI Limited encourages all of its workers to report any concerns related to direct activities, or the supply chains of the organisation in accordance with our Whistle-blowing policy.

We understand that Bondelivery NI Limited may be audited at any time and compliance with modern slavery commitments is essential to the relationship we have with our suppliers