



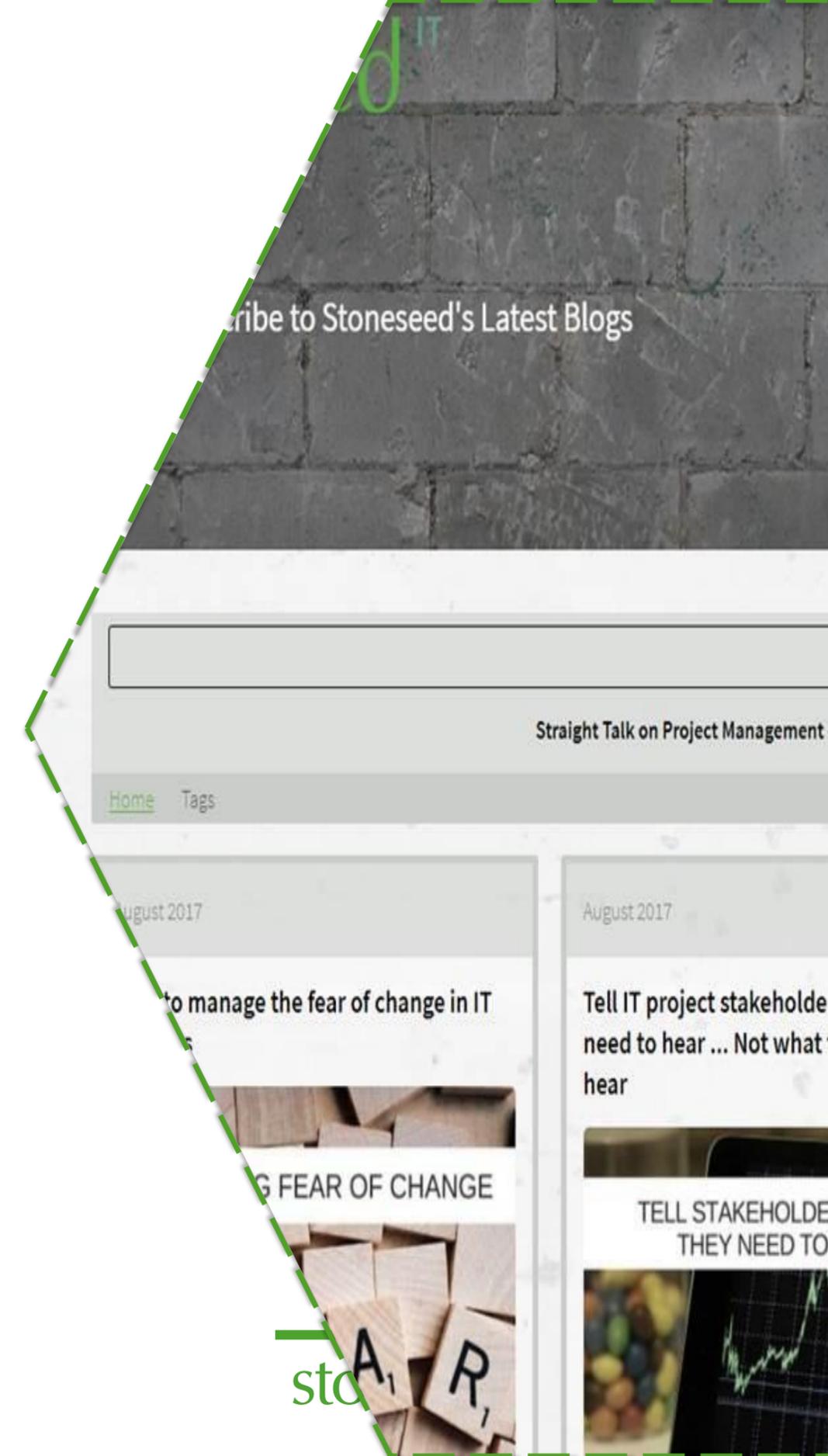
stoneseed^{IT}
*Modern Slavery Act Policy
Statement
2017/2018*

1) Policy Statement

- *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.*
- *Stoneseed has a zero-tolerance approach to modern slavery and we 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.*
- *We are also 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.*
- *This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives and business partners.*
- *This policy does not form part of any employee's contract of employment and we may amend it at any time.*

2) Responsibility for the Policy

- *The Stoneseed board of directors 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 HR Manager has 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.*
- *Any employee, contractor, client or business partner is 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 emma.jordan@stoneseed.co.uk*



3) Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

- The prevention, detection and reporting of modern slavery in any part of our business, client environment 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.*
- You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.*
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, client environment or supply chains at the earliest possible stage.*
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or company Director as soon as possible.*
- You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business, client environment and supply chains.*
- 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 line manager or company 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. 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 line manager immediately. If the matter is not remedied, and you are an employee of Stoneseed, you should raise it formally using our Fair Treatment and Grievance Procedure, which can be found in Stoneseed Staff Policies handbook, available on the company intranet.*



Training

We want to help our employees to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context.

We have highlighted the modernslavery.co.uk site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline.

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

10 things you may not know about slavery in the UK

1. The UK Government estimates there are tens of thousands people in slavery in Britain today
2. Only 1% of enslaved people in the UK have the chance of seeing their exploiter brought to justice
3. In 2015, over 3,000 people, including nearly 1,000 children, were referred to British authorities as potential victims of slavery
4. But nearly 40% of them were still awaiting a decision about their victim status at the end of the year
5. From those who have received a final decision, only less than half were recognised as victims
6. Victims of slavery are four times less likely to be acknowledged as victims if they are non-European
7. Up to 34% of victims of slavery are estimated to be re-trafficked
8. Children are often deliberately targeted for their vulnerability
9. One in four victims of slavery in the UK is a child
10. 2016 saw the first conviction and sentencing of a British businessman for human trafficking