



<b>Modern Slavery Policy</b>	
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<b>Other Relevant Policies:</b> <ul style="list-style-type: none"><li>• Professional Code of Conduct</li><li>• Whistleblowing</li><li>• Safer Recruitment</li></ul>	
<b>Related Legislation, Regulation and Best Practice:</b> <ul style="list-style-type: none"><li>• Modern Slavery Act 2015</li></ul>	

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### 1. Introduction

- 1.1. Ategi maintains relationships with a number of different organisations and people in its supply chain and in its recruitment practices.
- 1.2. Modern Slavery is a criminal offence under the Modern Slavery Act 2015 and can occur in various forms, including servitude, forced or compulsory labour and human trafficking and will not be tolerated under any circumstances.
- 1.3. Breaches of this provision constitutes a gross misconduct offence.

## **2. Scope and Purpose of the Policy**

- 2.1. This policy sets out the Organisation's goals in preventing opportunities for modern slavery to occur.
- 2.2. The policy applies to all staff engaged to provide a service to Ategi.

## **3. Due diligence processes**

- 3.1. To ensure that modern slavery is prevented,

The Organisation will:

- Maintain clear policies and procedures preventing exploitation and human trafficking.
- Monitor the use and effectiveness of this policy, including the auditing of internal control systems to ensure they effectively counteract modern slavery.
- Ensure its managers take responsibility for ensuring that all those who report into them understand and comply with this policy.
- Ensure that all statutory checks are made during the recruitment of new employees and that salaries are not less than the national minimum or national living wage limits.
- Provide regular training to staff so that they can recognise the signs of modern slavery and what to do should they suspect any malpractice.

- 3.2. Ategi requires the following from all parties who work with us or provide a service to us:

- That they have their own Modern Slavery policy or statement in place to promote their commitment to modern slavery.
- That they pay their employees no less than the national minimum or national living wage limits.

## 4. Employee responsibilities

### 4.1. Employees should:

- At all times and in all respects act in the best interests of the Organisation and use your best endeavours to promote, develop and extend the Organisation's business and interests.
- Take all necessary steps to prevent opportunities for modern slavery to arise and to report to the Organisation areas which may be of risk, such as overseas suppliers not governed by the Modern Slavery Act.
- Take all necessary steps to work with the Organisation's established supplier list and seek authority from their line manager in the event they wish to try a new supplier.
- Engage with suppliers to convey the anti-slavery policy and gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business.
- Expect suppliers to hold the same standards and approaches towards anti-slavery and human trafficking.
- Notify management if there are any concerns about this policy being adhered to, in accordance with the Whistleblowing Policy.
- Familiarise themselves with the anti-slavery and human trafficking characteristics such as Forced labour, Bonded labour, Human trafficking, Descent-based slavery, Child slavery, Forced and early marriage.

## 5. Breaches of this policy

- Any employee who is found to be in breach of this policy will be investigated under the Disciplinary Policy, which could result in action being taken up to and including dismissal.
- Relationships with other parties working with us or on our behalf may be terminated in they are found to be in breach of this policy.