



Modern Slavery Policy	
Version Number	2024.2
Effective from	01/04/2026
Document Owner	Head of HR
Next Review Date	01/04/2027
Other Relevant Policies: <ul style="list-style-type: none">Professional Code of ConductWhistleblowingSafer Recruitment	
Related Legislation, Regulation and Best Practice: <ul style="list-style-type: none">Modern Slavery Act 2015	

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1. Introduction

- 1.1. Ategi is committed to acting ethically and with integrity in all its activities and relationships. This includes maintaining appropriate controls within its recruitment, employment, procurement and supplier management practices to help prevent modern slavery and human trafficking.
- 1.2. Modern slavery is a criminal offence under the Modern Slavery Act 2015. It includes slavery, servitude, forced or compulsory labour and human trafficking, and may involve exploitation that a person cannot refuse or leave because of threats, coercion, deception, abuse of

power or vulnerability. Ategi will not tolerate modern slavery or human trafficking in any part of its organisation or supply chains.

- 1.3. Breaches of this policy may constitute gross misconduct and may lead to disciplinary action, up to and including dismissal.

2. Scope and Purpose of the Policy

- 2.1. This policy sets out Ategi's commitment to preventing modern slavery and human trafficking and describes the steps the organisation will take to identify, reduce and manage risks within its operations, recruitment practices and supply chains.
- 2.2. This policy applies to all employees, workers, trustees, volunteers, agency workers, consultants, contractors, suppliers and any other parties working for, with, or on behalf of Ategi.
- 2.3. This policy should be read alongside related Ategi policies and procedures, including Safeguarding, Whistleblowing, Recruitment and Selection, Disciplinary, Procurement and Data Protection policies where relevant.

3. Due diligence processes

- 3.1. Ategi will take a proportionate and risk-based approach to preventing modern slavery. This includes considering the nature of the goods or services being purchased, the location of suppliers, the use of labour-intensive services, the value and length of contracts, and any other factors that may indicate increased risk.
- 3.2. Ategi will:
 - Maintain clear policies and procedures to prevent exploitation, forced labour, human trafficking and other forms of modern slavery.

- Review the effectiveness of this policy and associated controls through proportionate monitoring, internal checks, procurement oversight and review of any concerns, incidents or lessons learned.
 - Carry out proportionate due diligence before engaging new suppliers, contractors or agencies, particularly where services are labour-intensive, delivered through subcontractors, or otherwise considered higher risk.
 - Include appropriate expectations in supplier engagement and procurement processes, including compliance with applicable employment, immigration, health and safety, safeguarding and anti-slavery requirements.
 - 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 appropriate information, guidance or training so that staff can recognise potential signs of modern slavery and understand how to report concerns.
- 3.3. Ategi expects all parties who work with us, supply goods or services to us, or act on our behalf to:
- Comply with the Modern Slavery Act 2015 and all applicable employment, human rights, safeguarding, immigration and health and safety requirements.
 - Pay their employees and workers no less than the applicable National Minimum Wage or National Living Wage and ensure that workers are treated fairly, lawfully and with dignity.
 - Have appropriate policies, procedures or working practices in place to prevent modern slavery and be able to provide reasonable assurance to Ategi when requested.

- Notify Ategi promptly of any actual or suspected modern slavery concern connected with work delivered for Ategi or within a relevant supply chain.

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 reasonable steps to prevent opportunities for modern slavery to arise and report any areas of concern or potential risk, including concerns relating to suppliers, contractors, recruitment agencies or subcontractors.
- 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, where appropriate to their role, to communicate Ategi's expectations and seek assurance that reasonable steps are being taken to prevent modern slavery.
- Expect suppliers to hold the same standards and approaches towards anti-slavery and human trafficking.
- Report any concerns promptly to their line manager, a senior manager, or through Ategi's Whistleblowing Policy. Where a concern relates to a person supported by Ategi, a carer, a vulnerable adult or a safeguarding matter, the relevant safeguarding procedure must also be followed.
- Familiarise themselves with the signs and characteristics of modern slavery, which may include forced labour, bonded labour, human

trafficking, criminal exploitation, domestic servitude, child exploitation and other forms of coercion or control.

5. Breaches of this policy

- Any employee who is found to be in breach of this policy will be investigated under Ategi's Disciplinary Policy. This may result in disciplinary action up to and including dismissal.
- Relationships with suppliers, contractors, agencies or other third parties may be suspended or terminated if they are found to be in breach of this policy or unable to provide appropriate assurance in relation to modern slavery risks.