

Modern Slavery and Human Trafficking

1. Introduction

- 1.1. This policy sets out Restitute's position on modern slavery and human trafficking, explains how employees and volunteers of Restitute can identify any instances of this, and where they can go for help.

2. Monitoring and Policy Review

- 2.1. Compliance with the policy will be monitored by HR.
- 2.2. This policy will be reviewed by HR on an annual basis and will be updated where necessary.

3. Scope of this Policy

- 3.1. Restitute recognises modern slavery as a complex crime and a violation of fundamental human rights.
 - 3.1.1. Slavery did not end with abolition in the 19th century. Slavery continues today and can take a variety of different forms including bonded labour, child slavery, early and forced marriage, forced labour, descent-based slavery and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 3.2. Restitute has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings.
- 3.3. Restitute will ensure effective systems and controls are in place to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015.
- 3.4. Restitute expects the same high standards from all our contractors, suppliers and other business partners.
 - 3.4.1. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or Page 2 of 4 servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 3.5. Restitute encourages transparency and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 3.6. Restitute are committed to ensuring that no Restitute employee or volunteer suffers any detrimental treatment because 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.
 - 3.6.1. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 3.7. Any Restitute employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 3.8. Restitute may terminate its relationship with other individuals and/or organisations working with us or on our behalf if they breach this policy.

4. Who This Policy Applies To

- 4.1. The Modern Slavery and Human Trafficking Policy applies to all persons working or volunteering for Restitute and subsidiaries on our behalf in any capacity, including employees, trustees, volunteers,

contractors, external consultants, third-party representatives and business partners.

4.2. This policy does not form part of any employee's contract of employment.

5. **Definitions**

- 5.1. **'Slavery'**: Slavery is prohibited under the 1948 Universal Declaration of Human Rights which states: "No one shall be held in slavery or servitude: slavery and the slave trade shall be prohibited in all their forms."
- 5.1.1. Definitions of modern slavery mainly derive from the 1956 UN supplementary convention, which says: "debt bondage, serfdom, forced marriage and the delivery of a child for the exploitation of that child are all slavery-like practices and require criminalisation and abolishment".
- 5.2. **'Bonded labour'** or **'debt bondage'** refers to people who have fallen into debt and are forced to work for free in an attempt to repay it. Many will never pay off their loans and debt can sometimes be passed down through subsequent generations.
- 5.3. **'Child slavery'** refers to children in slavery as domestic workers, forced labour or trafficked for labour or sexual exploitation.
- 5.4. **'Descent-based slavery'** refers to people born into slavery because their families belong to a class of "slaves" within a society. The status of "slave" may pass from mother to child.
- 5.5. **'Early and forced marriage'** refers to women married without consent, often while still girls and forced into sexual and domestic servitude.
- 5.6. **'Forced labour'** refers to people forced to work, usually with no payment, through violence or intimidation. Many find themselves trapped, often in a foreign country with no official documentation and unable to leave.
- 5.7. **'Human trafficking'** is the transport or trade of people from one area to another and into conditions of slavery.

6. **Responsibilities**

6.1. **Employer Responsibilities**

- 6.1.1. The Chief Executive has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all Restitute employees and volunteers comply with it.
- 6.1.2. The Finance function is responsible for ensuring that Restitute's zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 6.1.3. The Finance function 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.
- 6.1.4. Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

6.2. **Employee Responsibilities**

- 6.2.1. All employees have a responsibility for ensuring the prevention, detection and reporting of modern slavery in any part of our business or supply chains.
- 6.2.2. Employees and volunteers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

7. Procedure

- 7.1. Employees must raise concerns about any issue or suspicion of modern slavery in any parts of Restitute's business or supply chains of any supplier at the earliest possible stage.
 - 7.1.1. If you believe or suspect that a conflict with this policy has occurred, or may occur in the future, employees must notify your line-manager as soon as possible.
 - 7.1.2. If you believe or suspect a breach of this policy has occurred or may occur, you must notify your line-manager as soon as possible.
 - 7.1.3. 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, you should raise your concerns with your line-manager or CEO.
 - 7.1.4. If you believe that you have suffered any detrimental treatment as a result of reporting your concerns, you should inform your line manager or CEO immediately.
 - 7.1.5. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

8. Procurement procedures:

- 8.1. Restitute operates a supplier policy and maintains a preferred supplier list.
- 8.2. Restitute will conduct due diligence on all suppliers before allowing them to become a preferred supplier.
- 8.3. Our modern slavery and human trafficking policy forms part of our contract with all preferred suppliers and they are required to confirm that no part of their business operations contradicts this policy.
- 8.4. We may terminate the contract at any time should any instances of modern slavery come to light.

Last Review Date: September 2024

Next Review Date: August 2025