

## **MODERN SLAVERY, ILLEGAL WORKERS AND HUMAN TRAFFICKING POLICY**

**This statement constitutes our Modern Slavery and Human Trafficking policy, setting out the steps we have taken to combat modern slavery within our supply chain and confirming our commitment to taking continued effective action to support the eradication of modern slavery and human trafficking in global supply chains.**

**The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) by Scutum UK Ltd (“Scutum”).**

**The Act requires businesses such as ours to publish an annual statement setting out the steps that have been taken to prevent modern slavery in the business’ operations and supply chains.**

### **1. Introduction**

1.1. At Scutum we are committed to maintaining the highest standards of ethical conduct and social responsibility. We strongly condemn modern slavery, human trafficking, and the employment of illegal workers. This policy outlines our approach to preventing these practices and ensures compliance with relevant legislation, including Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006 and the Home Office Guidance Comprehensive Guidance for Employers on preventing illegal working.

### **2. Definitions**

2.1 Modern Slavery: Modern slavery encompasses various forms of exploitation, including slavery, servitude, forced or compulsory labour, and human trafficking.

2.2 Human Trafficking: Human trafficking involves the recruitment, transportation, transfer, harbouring, or receipt of persons through force, coercion, or deception for the purpose of exploitation.

2.3 Illegal Workers: Illegal workers refer to individuals who do not have the legal right to work in the country where they are employed.

### **3. Responsibilities**

3.1 Senior Management: Senior management is responsible for setting the tone and ensuring a zero-tolerance approach to modern slavery, human trafficking, and the employment of illegal workers. They must foster a culture where everyone understands the importance of compliance with this policy.

3.2 Human Resources: The Human Resources department is responsible for implementing and monitoring compliance with this policy. They will oversee the recruitment process, maintain necessary records, and ensure that all employees are eligible to work legally.

3.3 Employees: All employees must familiarise themselves with and adhere to this policy. They should report any concerns related to modern slavery, human trafficking, or suspicions of illegal workers to the Human Resources department.

## **4. Recruitment and Employment**

**4.1 Eligibility to Work:** All individuals employed by Scutum must provide satisfactory evidence of their eligibility to work in accordance with the Immigration, Asylum & Nationality Act 2006. This includes verifying their identity and checking their right to work in the United Kingdom.

**4.2 Document Verification:** We will conduct thorough checks to verify the authenticity of documents provided by potential employees. This includes verifying passports, visas, work permits, and any other required documentation. Documents will be retained for a least 2 years once an individual has left the company.

**4.3 Nationality Identification:** To ensure compliance with legal requirements, we will implement appropriate procedures to identify the nationality of foreign workers. This may involve collecting data such as passport information, visa details, or immigration status. The collection and storage of this data will be in accordance with applicable data protection laws.

**4.4 Temporary, Seasonal Workers or Subcontractors:** We expect our subcontractors and Temporary staff to share our commitment to preventing modern slavery, human trafficking, and the employment of illegal workers. We will assess their compliance with this policy and take necessary actions to address any concerns. We work directly with recruiting agencies and ensure periodic checks and controls of their right to work

## **5. Training and Awareness**

**5.1 Training:** All employees involved in the recruitment and employment processes will receive appropriate training to understand the risks associated with modern slavery, human trafficking, and the employment of illegal workers. This training will focus on identifying signs of exploitation, understanding legal obligations, and reporting any suspicions or concerns.

**5.2 Awareness:** We will raise awareness among our employees about the importance of preventing modern slavery, human trafficking, and the employment of illegal workers. This may include communication campaigns, posters, and regular updates on this policy.

## **6. Reporting and Whistleblowing**

**6.1 Reporting Concerns:** We encourage all employees to report any concerns related to modern slavery, human trafficking, or suspicions of illegal workers promptly. Reports can be made to the Human Resources department or via our designated Notify Whistleblowing App/Website.

**6.2 Non-Retaliation:** We will ensure that individuals who report concerns in good faith are protected from retaliation. Any form of victimisation or discrimination against whistleblowers will not be tolerated.

## **7. Our Supply Chains**

**7.1 Responsibilities:** Our Group recognises that we have a responsibility to review ongoing internal practices in relation to our labour force, as well as our supply chains. Our Group does not knowingly enter into business with other organisations, in the United Kingdom or abroad, which knowingly support or are found to involve themselves in slavery, servitude, forced or compulsory labour, or abuse of power over vulnerable individuals.

## 8. Compliance and Monitoring

**SCUTUM**

8.1 Compliance: We are committed to complying with all relevant legislation, including Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006 and the Home Office Guidance Comprehensive Guidance for Employers on preventing illegal working. We will regularly review and update our procedures to ensure ongoing compliance.

8.2 Monitoring: Regular audits and reviews will be conducted to monitor compliance with this policy. These audits may include document checks, interviews with employees, and assessments of our subcontractors and suppliers.

## 9. Consequences of Non-Compliance

9.1 Consequences: Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or termination of business relationships with subcontractors or suppliers.

## 10. Communication and Review

This policy will be communicated to all employees, subcontractors, and suppliers. It will be reviewed periodically to ensure its effectiveness and relevance.

## 11. Conclusion

By implementing this policy, we aim to create a work environment free from modern slavery, human trafficking, and the employment of illegal workers. We are committed to continuously improving our practices, educating our employees, and working collaboratively with relevant stakeholders to combat these illegal and unethical activities.



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