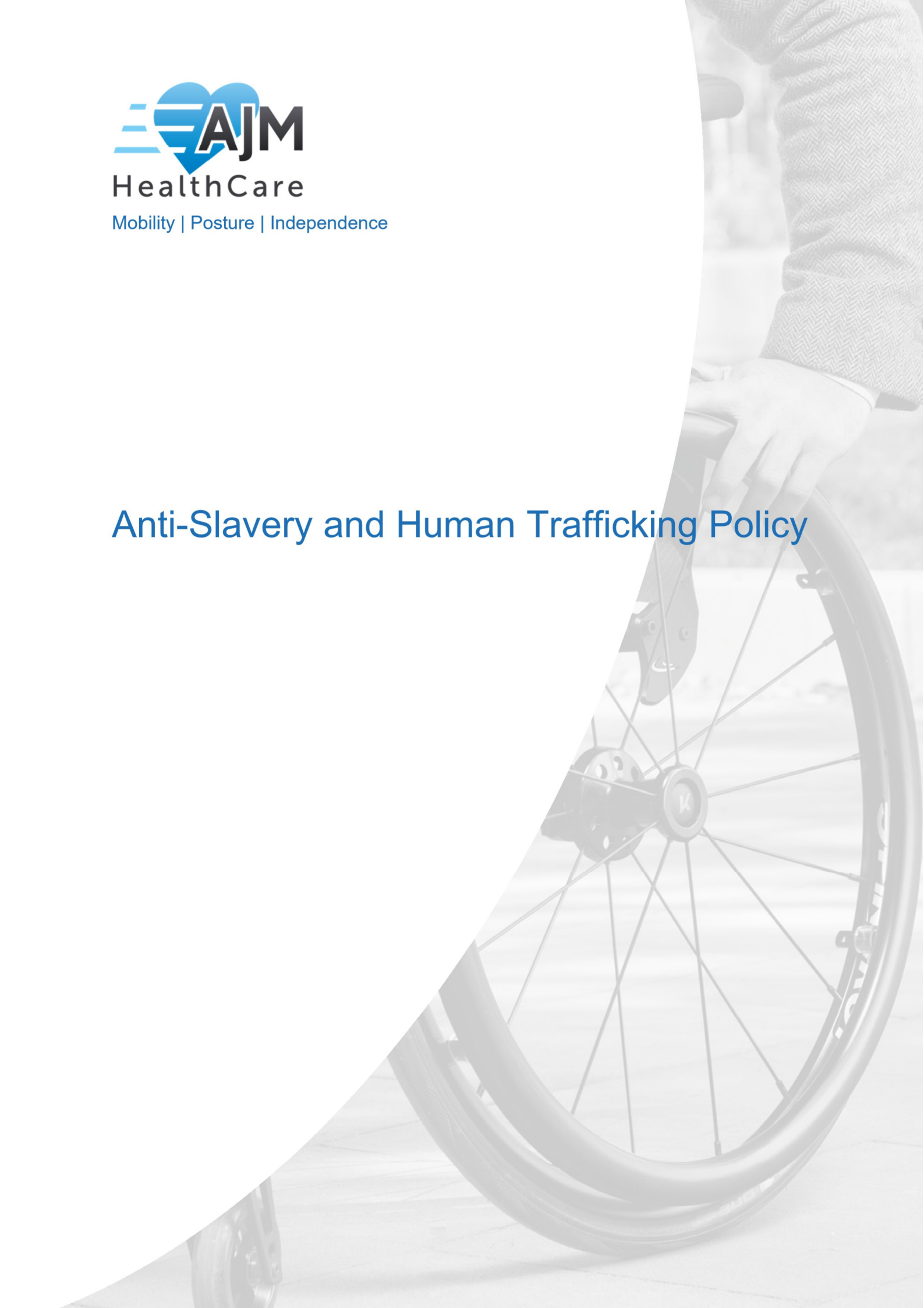




HealthCare

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## Anti-Slavery and Human Trafficking Policy



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Distribution	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, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.
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# 1. Introduction

- 1.1 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, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.
- 1.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.3 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. 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.

# 2. Commitments

- 2.1 We are 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. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 2.2 **Adherence to local and national laws:** We commit to remain up to date with changes to relevant employment legislation. Relevant employment legislation with regards to our direct operations is outlined in the Employee Handbook and various policies.
- 2.3 **Freedom of Movement:** Workers are free to terminate their employment upon reasonable notice without penalty. Workers are not prevented from leaving worksites or employment, except for reasonable safety or security reasons.
- 2.4 **Freedom of Association:** In conformance with local law, where workers choose to be represented by trade unions or works councils, we will cooperate in good faith with the bodies that the employees collectively choose to represent them.
- 2.5 **Pay:** Workers are paid on time, as per employment terms and conditions. Salaries, benefits and overtime rates meet, as a minimum, national legal standards. Line

managers actively handle salaries paid and hours worked with support of IT systems, HR and payroll team members.

- 2.6 Recruitment Fees:** AJM are responsible for all costs and fees associated with recruitment of workers regardless of the manner or location of the imposition or collection of the fee. Workers do not pay recruitment or other fees irrespective of the method of payment or by whom it was collected. Workers do not suffer unlawful pay deductions, to secure a job or for continued service, nor disproportionate monetary penalties as a disciplinary measure.
- 2.7 Discrimination and harassment:** Our employment practices ensure we do not discriminate based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated.
- 2.8 Prohibits any threat of violence, harassment and intimidation:** No worker will suffer coercion, either direct threats of violence or more subtle forms of compulsion. No person shall be under any menace of any penalty and enters into work voluntarily.
- 2.9 Working conditions:** Workers enjoy a safe and hygienic working environment. Access to clean toilet facilities, water and sanitary kitchen facilities for food storage are provided.
- 2.10 Working time and rest:** Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods.
- 2.11 Prohibits compulsory overtime:** No workers shall fear dismissal for refusing overtime over and above their contractual obligations and it shall not be the only way that a worker can earn the minimum wage.
- 2.12 Prohibits child labour:** Workers below 15 or the legal minimum working age (whichever is higher) are not hired, either directly or indirectly. We prohibit the use of child labour and forced or compulsory labour at all our sites. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work. This includes forced or compulsory recruitment of children for use in armed conflict, child prostitution and pornography, using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children.
- 2.13 Prohibits confiscation of workers original identification documents:** Workers' original identification documents are not retained.

2.14 **Provides access to remedy, compensation and justice of victims of modern slavery:** A grievance procedure is in place by which workers can make complaints and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment.

2.15 We expect the same high standards from all our contractors, suppliers, and other business partners to apply these provisions as guidance.

### 3. Responsibility for the policy

3.1 The 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.

3.2 The Operations Director / National Operations Manager have 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.

3.3 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.

### 4. Compliance with the policy

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

4.2 The prevention, detection and reporting of modern slavery in any part of our business 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.

4.3 You must notify your manager or a member of the HR Team as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

4.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or a member of the HR Team or report it in accordance with our Whistleblowing Policy as soon as possible.

4.6 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 manager or a member of the HR Team.

4.7 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.

4.8 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 form is or may be taking place in any part of our own business or in any of our supply chains. 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 a member of the HR Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy.

## **5. Communication and awareness of this policy**

5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **6. Breaches of this policy**

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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

## **7. Support**

7.1 The Non-Government Organisation (NGO) Unseen operates a UK-wide 24/7 Modern Slavery Helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.