

adt workplace

***ANTI-SLAVERY POLICY  
AND PROCEDURE***

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## Anti-Slavery Policy and Procedure

### 1 Introduction

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 commercial or personal gain.

The company have zero-tolerance to modern slavery and we are committed to acting in an ethical manor and show integrity in our operations. We undertake to implement and enforce robust procedures and systems to ensure modern slavery is not taking place anywhere in our business or within our supplier base.

We undertake to behaving in a transparent and consistent fashion ensuring we meet our disclosure obligations under the Modern Slavery Act 2015.

The company expects the same high standards from all of our contractors, suppliers and other business partners. As part of our purchasing and contracting processes, we will, where possible, 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.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels; directors, managers, employees, agency workers, workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

#### 1.1 Responsibility for the Policy

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director 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.

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

## **1.2 Communication and Awareness of this Policy**

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 updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **1.3 Breach of this Policy**

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

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

## **1.4 Anti-Slavery Procedure**

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

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.

You must notify your line manager or a Company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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 at the earliest possible stage.

If you are unsure about whether a particular act, treatment of workers, or their working conditions constitutes any form of modern slavery, raise it with your line manager or a company Director.

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. 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 your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

## **2 Retention and Access to your Personal Information**

### **Why do we need to retain your personal information?**

All personal information will be retained for 6 years after you leave the company's employment as per the guidance from the Information Commissioners Office

### **Where do we retain your personal information?**

Any records relating to breaches of this Policy could result in Disciplinary Action. All relevant paperwork will be retained in the Discipline and Grievance Section of your BreatheHR record. At the conclusion of the Discipline / appeal the record will be updated, associated documents will be scanned and added, and the originals will be destroyed.

### **Who has access to your personal information?**

You will have access to all your personal information via your Personal Profile on BreatheHR. Your HR user and People Matters HR will also have access to all your personal information. Your Line Manager will only have access to certain information and this will be outlined to you at Induction.

### **How do you make a request to have your personal information amended or deleted?**

You will have access to update certain information on BreatheHR via your Personal Profile page. For other information to be amended or deleted, this will need to be put in writing to your Line Manager who will respond with a decision accordingly.

Please note that you must keep all your personal data and emergency contact information up to date.