

[LOGO]

[COMPANY NAME]
(the “Company”)

**MODERN SLAVERY AND HUMAN TRAFFICKING
STATEMENT**

[PERIOD]

INTRODUCTION FROM THE MANAGING DIRECTOR

Modern slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

[Brief details about the COMPANY].

[Describe here the INDUSTRY “group”, including any subsidiary undertakings, possibly with information about employee numbers and countries in which the “group” operates].

The group has an annual turnover in excess of £36m.

OUR BUSINESS

Our business is organised into [NUMBER] business units [EXAMPLE Managed Retail, Tenancy, Production / Distribution and Property].

OUR SUPPLY CHAINS

Our supply chains include [Brief details of SUPPLY CHAINS].

OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

[HERE please use examples as appropriate to your business activity]

As part of our initiative to identify and mitigate risk:

[EXAMPLE]

- Where viable, we run licenced premises as managed houses to ensure optimum control of the work environment;

[EXAMPLE]

- We limit the geographical scope of our licenced premises to ensure optimum supervision of the use of our properties;

[EXAMPLE]

- Where possible we build long standing relationships with local suppliers and tenancy customers and make clear our expectations of business behaviour;

[EXAMPLE]

- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the food chain to,

at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the food chain, ultimately to the field or utility generator.

[EXAMPLE]

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

[EXAMPLE]

- Employee assurance: Confirmation that appropriate right to work documentation is obtained for all staff including temps, interns and business work placement staff, and that working practices, and facilities could not expose the Group to the legislation.

[EXAMPLE]

- We will review and update our approach and Policies that our company and supply chain is free from modern slavery and human trafficking as our businesses and the inherent risks change over time.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

[EXAMPLE The Tenancy, Commercial and Retail Directors] are responsible for compliance in their respective departments and for their supplier relationships.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

[TRAINING REQUIRED, MAKE SURE YOURSELF AND YOUR TEAM IS TRAINED APPROPRIATELY.]

[FOR MORE INFORMATION VISIT
WWW.WARWICKSHIREBUSINESSWATCH.CO.UK]

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of House Audits by Area Managers and Business Development Managers;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and

constitutes our group's slavery and human trafficking statement for the current financial year

[COMPANY NAME]

[NAME OF SENIOR MEMBER OF THE COMPANY]

[JOB ROLE]

[NAME]

End of last financial year: [DATE]

Approved by the Board on:[DATE]