



## Anti-Slavery & Human Trafficking Policy

Management Training & Development Limited maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, the Company has reviewed its existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of the businesses or in its supply chains. The policy below underpins the Company's approach and will be used as a basis for the Company's Statement on Slavery and Human Trafficking.

### 1. Introduction

Slavery can be found throughout the world, even in developed countries. It is estimated some 30 million people around the world today live in some form of modern slavery. Common forms of modern slavery include:

#### 1.1. Sale and exploitation of children

The sale and exploitation of children involves situations where children are transferred by one person to another for remuneration, or other consideration. Examples include unlicensed gold mining activities where children can easily access narrow tunnels and shafts.

#### 1.2. Human Trafficking

Human trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person through coercive means, such as force, deception or abuse.

#### 1.3. Forced Labour

Forced Labour is work or service that is taken from a person under the menace or threat of a penalty and for which the person has not offered themselves voluntarily.

#### 1.4. Debt Bondage

Debt bondage is a worker pledging their labour as security for a debt, (often a payment to get the job in the first place) when either the real value of the work undertaken is never applied to repayment of the debt or the length and nature of the work that has to be undertaken is never fully defined or limited. Often the upfront fee is funded by loans with interest rates as high as 60% pa, often taking 2 years to pay them off before they have any disposable income.

One example in the UK was in 2012; 30 migrant workers were liberated from exploitative labour conditions in Kent. The workers were trafficked from Lithuania to work on free-range

chicken farms supplying Freedom Foods and Happy Eggs. Once in the UK they were held in debt bondage, forced to work 17 hours a day and held under control by violence and verbal abuse at the hands of Lithuania enforcers.

The Company expects all who have, or seek to have, a business relationship with Management Training & Development Limited to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with its aim.

## **2. Purpose of this policy**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the 'Act'). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of Management Training & Development Limited (the 'Company') with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act.

The Company has a zero-tolerance approach to modern slavery. It is 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 within our Company or those of its suppliers.

## **3. Steps for the prevention of modern slavery**

The Company is committed to ensuring there is transparency in its own business and in our approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and the Company is evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Company expects its suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with the Company's procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

Whilst recognising the Company's statutory obligation to set out the steps it has taken to ensure that modern slavery and human trafficking is not taking place in its supply chains, the Company acknowledges that it does not control the conduct of individuals and organisations in its supply chains. To underpin its compliance with practical steps, the Company intends to implement the following measures:

- conduct risk assessments to determine which parts of the business and which of the Company's suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- engage with the Company's suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- where appropriate, as informed by the Company's risk assessment, seek to introduce further supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- introduce contractual provisions for the Company's suppliers to confirm their adherence to this policy and accept the Company's right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

#### **4. Responsibility for the policy**

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with its legal and ethical obligations.

Managers 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.

#### **5. Actions to report modern slavery or human trafficking**

##### **5.1. Whistleblowing procedure – direct access to senior leadership**

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or its suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the HR policies.

In summary, employees should approach either their line manager or the Chief Operating officer in the first instance. The nature of the complaint will determine the Company's next course of action.

##### **5.2. Suspicious activity confidential feedback email**

A confidential email address of the Chief Operating Officer– [kelli.grinter@mtdtraining.co.uk](mailto:kelli.grinter@mtdtraining.co.uk) - may be accessed by employees or any other person wishing to raise a concern. Employees should notify the Company in any of the following circumstances:

- an employee suspects a person acting on behalf of the Company or one of its businesses is seeking to exploit another in a way which could amount to modern slavery,

- an employee suspects that a person acting on behalf of one of its suppliers is seeking to exploit another in a way which could amount to modern slavery,
- an employee has received an approach from a person acting on behalf of LMH or one of its businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed,
- an employee has information which leads to the rational conclusion that a person acting on behalf of LMH or one of its businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Any reports to the email address above are kept in confidence, subject to the need for the Company to act responsibly and within the law. In addition the source of reports to the email address will be kept confidential, save to the extent that maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with the Company maintaining adequate procedures for the prevention of modern slavery being committed on its behalf or in any element of its supply chain.

### **5.3. Direct communication**

The Company encourages members of the public or people not employed by us to write to the Chief Operating Officer, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain who will then commence an appropriate investigation.

## **6. Safeguards**

The Company aims 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. The Company is committed to ensuring no one 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 its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

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

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

## **8. Review**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed on a regular basis (at least annually).

## **9. Changes**

The above policy is non-contractual and the Company reserves the right to amend it at any time.