Modern Slavery Policy and Procedure

1. Policy Statement

Salterns respects the human rights of all employees and expressly prohibits forced labour, child labour, and any form of modern slavery. We share the British Government's view that modern slavery is a heinous crime affecting individuals and communities worldwide and recognise that organisations have a responsibility to ensure their supply chains are free from slavery.

Salterns is committed to acting ethically, with integrity, and ensuring that modern slavery or human trafficking is not taking place in any part of our business or supply chain. We implement and enforce effective systems and controls to prevent slavery and human trafficking, and we aim to provide positive, fair, and transparent employment practices.

2. Scope

This policy applies to all employees, agency workers, contractors, consultants, trainees, suppliers, and any other person engaged with Salterns. It covers all operations, business relationships, and supply chains globally.

3. What is Modern Slavery?

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave work due to threats, coercion, deception, or abuse of power. This includes, but is not limited to:

- Forced labour – work done involuntarily under threat or coercion
- Human trafficking – the recruitment, transportation, or harbouring of individuals for exploitation
- Child labour – employment of children below the legal minimum working age
- Debt bondage – work demanded as a means of repayment under unfair or abusive conditions
- Other forms of exploitation where workers are denied basic human rights, fair pay, or freedom of choice
- Salterns recognises that modern slavery can occur in supply chains, workplaces, and third-party relationships, and we are committed to identifying, preventing, and addressing these risks.

4. Principles

- Salterns does not employ child labour or forced labour.
- All employees receive fair wages, exceeding the National Minimum Wage, with paid holiday in line with statutory requirements.
- Employees are offered appropriate opportunities for learning, development, and career progression.
- Salterns operates a zero-tolerance approach to modern slavery and human trafficking.
- We expect all employees, suppliers, and contractors to uphold the same standards.
- Concerns regarding modern slavery or unethical practices may be raised in good faith and will be treated confidentially and without retaliation.

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5. Roles and Responsibilities

5.1 Employer Responsibilities

- Salterns will:
    - Ensure employment practices are fair, ethical, and compliant with all applicable laws
    - Maintain oversight of supply chains and implement controls to prevent modern slavery
    - Conduct due diligence when onboarding new suppliers, contractors, or business partners
    - Provide training and awareness to employees on identifying and reporting modern slavery risks
    - Respond promptly to any allegations or concerns raised in relation to modern slavery

5.2 Employee Responsibilities

- All employees are required to:
    - Take reasonable care to ensure their actions do not contribute to modern slavery or human trafficking
    - Report any suspicions or concerns relating to slavery, forced labour, or child labour promptly through the whistleblowing process
    - Cooperate with investigations and audits relating to supply chain compliance

5.3 Contractor and Supplier Responsibilities

- All contractors and suppliers engaged by Salterns must:
    - Comply with all applicable laws regarding modern slavery and human trafficking
    - Complete supply chain compliance questionnaires and declare that slavery is not present within their organisation or supply chain to the best of their knowledge
    - Maintain awareness of potential slavery risks within their operations and supply chains and take steps to mitigate them
    - Cooperate fully with audits, inspections, and requests for information from Salterns

6. Procedure

Salterns maintains a range of procedures and controls to prevent modern slavery and human trafficking within its business and supply chains. These procedures provide guidance on due diligence, reporting, and monitoring and must be followed by all employees, contractors, and suppliers at all times. Compliance with these procedures is essential to ensure ethical practices and uphold Salterns' commitment to human rights.

6.1 Supply Chain Due Diligence

- All new suppliers must complete a supply chain compliance questionnaire as part of the new supplier approval process
- Suppliers will be asked to declare that slavery is not present within their organisation or supply chains
- Suppliers will be asked to confirm whether they have investigated their business and supply chains for potential slavery risks
- Salterns will monitor suppliers, particularly smaller suppliers, who may be at higher risk of involvement in unethical practices

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- The supply chain compliance process is under continuous development, and future updates will be issued accordingly

6.2 Raising Concerns

- Employees, contractors, and trainees may raise concerns in good faith regarding modern slavery or human trafficking
- Concerns may be raised through line managers, HR, or the whistleblowing procedure
- All reports will be investigated promptly, confidentially, and proportionately, and appropriate action will be taken

6.3 Monitoring and Auditing

- Salterns will maintain records of supplier declarations, audits, and any concerns raised
- Regular reviews of supply chains and procurement practices will be conducted to identify and mitigate any modern slavery risks
- The effectiveness of controls will be reviewed periodically, and improvements implemented as required

7. Training

- Employees in will receive training on recognising and preventing modern slavery
- Suppliers and contractors will be informed of Salterns' modern slavery expectations as part of onboarding
- Refresher training will be provided periodically or when legislation or internal procedures are updated

8. Enforcement

Failure to comply with this policy by employees, suppliers, or contractors may result in disciplinary action, termination of contracts, or cessation of supplier relationships. Serious breaches may be treated as gross misconduct or a breach of contract.

9. Related Policies

- Whistleblowing Policy and Procedure
- Recruitment Policy and Procedure
- Disciplinary Policy and Procedure

10. Review of Policy

This policy will be reviewed periodically to ensure it remains fair, effective, and aligned with legal requirements and ACAS guidance.

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