

# Anti-Slavery and Human Trafficking Policy



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## Policy Statement

Lilac Alliance commits to developing and adopting a proactive approach to tackling hidden labour exploitation. Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or the labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

As a thriving Recruitment Business, Lilac Alliance maintains relationships with many different organisations in its supply chain, as well as supplying directly to hirers a significant number of agency workers.

In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our 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 our businesses or in our supply chains. With a turnover of under £36m, a Statement on Slavery and Human Trafficking is not required by the Act but to support our clients accordingly we have created this policy to ensure compliance wherever we operate in their supply chains.

Lilac Alliance requires the highest standard of business conduct in its relationship with its customers, suppliers, and others striving to conduct its business in accordance with the highest standards of business ethics.

According to the International Labour Organization (ILO), there are currently an estimated 21 million forced labour victims worldwide, including children and everyone has a responsibility to work towards ending these conditions.

Lilac Alliance is committed to conducting its business in a manner that ensures the absence of slavery and human trafficking in its supply chain.

## Purpose of This Policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act") and a violation of fundamental human rights. 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 Lilac Alliance (the "Company") with the aim of the prevention of opportunities for modern slavery to occur within its business 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. 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 business or in any of our supply chains.

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

## Steps For The Prevention of Modern Slavery

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We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery through-out our supply chains, consistent with our disclosure obligations under the Act. 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. We expect our suppliers to 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, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. All our staff have an obligation to familiarise themselves with our 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.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

## Responsibility For The Policy

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

Simon Goddard has primary 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

Employees 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.

## Actions To Report Modern Slavery or Human Trafficking

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 our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found on the Company's intranet site.

In summary, employees should approach their Divisional Director. The nature of the complaint will determine the Company's next course of action.

If you believe or suspect a breach of this policy has occurred or that it may occur we ask that you report it in accordance with our Whistleblowing Procedure as soon as possible. You should note that where appropriate and necessary, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

#### **You should contact a Director in any of the following circumstances:-**

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

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within many tier of our supply chains constitutes any of the various forms of modern slavery, please feel free to raise it with a Director.

#### **Direct Communication**

The Company encourages members of the public or people not employed by us to write, in confidence, to the Directors at Bank House, Marshall Terrace, Cross Gates, Leeds, LS15 8EA to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

#### **Safeguards**

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. 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.

#### **Supplier Conduct**

By accepting purchase orders from Lilac Alliance, each supplier will agree to be bound by our Policies. Among other assurances, this requires suppliers to certify that materials incorporated into the product comply with UK laws regarding slavery and human trafficking. Other requirements include

complying with environmental laws and regulations and UK anti-bribery laws.

#### **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 regular training will be provided as necessary.

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.

#### **Organisational Structure**

This policy applies across all of the Company's sites including Head Office, Branch Offices, On-sites and seasonal Onsites.

#### **Policy Commitments**

The Company shall:

1. Designate appropriate managers to attend 'Tackling Modern Slavery in UK Businesses and Supply Chains' training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organization to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third party labour exploitation and signs to look for and have signed the appropriate Compliance Principles document.
4. Ensure that labour sourcing, recruitment and worker placement processes are under control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Provide information on tackling 'Hidden Labour Exploitation' to our workforce through workplace posters, worker leaflets, worker registration details, client site inductions and other relevant or necessary training.
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
9. Require labour providers and other organizations in the labour supply chain to adopt policies and procedures consistent with the above.

#### **Review**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

Date of Adoption December 2016

Last Review Date December 2025