

## SECTION FIFTEEN: Modern Slavery Policy

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Modern slavery is a crime and a violation of fundamental human rights. It can take many forms, deprives a person of their liberty and usually involves financial exploitation.

WRAS conducts its business fairly, ethically and with respect to fundamental human rights and is fully committed to the prevention of all forms of slavery, forced labour, servitude, child labour and human-trafficking, both within its own business and within its supply chains.

This policy does not form part of any employee's Contract of Employment and may be amended at any time.

This policy applies to all persons working for WRAS or on its behalf in any capacity, including trustees, employees, volunteers, agency workers, agents, contractors, consultants, third-party representatives and business partners. If you fall into one of those categories, you are required to read and comply with this policy.

The Trustees have overall responsibility for this policy.

Failure to comply with this policy may result in disciplinary action, including dismissal or termination of the contract between you and WRAS. It could also involve other legal steps being taken against you.

### **Preventing Slavery & Human Trafficking**

WRAS makes appropriate checks on all employees, recruitment agencies and suppliers to know who is working for it or on its behalf.

WRAS provides every employee with a written Contract of Employment and pays its employees in accordance with the law. WRAS complies with its legal obligations to ensure the health, safety and welfare of all of its employees, including in relation to working hours, rest breaks and holidays.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

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 Operations Director.

### **Employees & Workers**

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

The prevention, detection and reporting of modern slavery in any part of WRAS' operation or supply chain is the responsibility of all those working for WRAS or under its control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy and must notify your Manager as soon as possible if you have any suspicions of modern slavery or human trafficking within WRAS' operation or supply chain or if you believe or suspect a breach of this policy has occurred or that it may occur. You should raise concerns at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions constitutes any of the various forms of modern slavery, raise it with your Manager without delay.

WRAS 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. WRAS is 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 WRAS' operation or in its supply chain. 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 Manager immediately. If the matter is not remedied and you are an employee, you should raise it formally using the Grievance Procedure or the Whistleblowing Policy.