



Anti -Slavery and Human Trafficking Policy

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Date: Jul 19

1 Policy Statement

- 1.1 Modern slavery is a crime and violation of fundamental rights. It takes various forms including slavery, servitude, compulsory labour and human trafficking for exploitation, all of which deprive a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.1.2 Mobile Solutions (UK) Ltd have a zero tolerance approach to modern slavery within our organisation, as well as in our supply chains. We are committed to ensuring we are not connected to modern slavery in any way, and that there is transparency in our business and in our approach to tackling modern slavery that is consistent with our obligations under the Modern Slavery Act 2015.
- 1.1.3 Mobile Solutions aims to have the same high standards from all of our contractors, suppliers and other business partners. As part of our supplier approval process we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.1.4 This policy applies to all persons working for us in any capacity. All employees and Directors will have read, understood and comply with this policy.

Signed
Gail Elder-Smith
Director

Date:

2 In order to enhance Mobile Solutions Policy commitment, the following specific measures were progressed during 2018-2019

2.1 Additional training in the form of a new module on the companies 3rd party Health & Safety Portal TM38 Modern Slavery has been submitted to all employees for completion

3 Purpose

3.1 This policy sets out Mobile Solutions approach to Modern Slavery, we aim to have zero tolerance to Modern Slavery and committed to providing training to all our employees to ensure their understanding of the Act.

3.1.2 To implement processes and controls which ensure that Mobile Solutions meet the requirements of the Modern Slavery Act 2015

4 Responsibility

4.1 The Director of the company has overall responsibility for implementing and ensuring this policy complies with our legal and ethical obligations.

4.1.2 The Office Manager has day to day responsibility to ensure all employees are familiar with this policy and receive a copy on induction.

4.1.3 Employees of Mobile Solutions (UK) Ltd have a responsibility to report any actual or suspected instances of modern slavery throughout the business or supply chain to the Directors.

4.1.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with the policy and are given adequate and regular training on it and the issues of modern slavery.

5 Scope

5.1 This policy applies to all persons working for Mobile Solutions or on our behalf in any capacity, including employees at all levels, directors, managers, sub contractor and third party representatives.

6 Supply chain management

6.1 We will not support or deal with any business which is known to be involved in slavery or human trafficking

6.1.2 As part of our due diligence, prior to approving a new supplier, we will review the controls which they undertake to eliminate modern slavery and human trafficking, particularly in regard to goods imported from outside the UK and EU which are potentially more at risk of involving slavery and human trafficking.

7 Compliance

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

7.1.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to or suggest a breach of this policy

7.1.3 All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy or that a breach may occur

7.1.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.

7.1.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

7.1.6 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 unfavorable treatment connected with raising concern. If you believe that you have suffered any such treatment, you should inform the Director immediately. If the matter is not remedied and you are an employee you should raise it formally using our

8 Training

- 8.1 We will provide training about the risks of modern slavery and human trafficking to all our employees on induction.
- 8.1.2 Training is provided in the form of a leaflet and factsheet found on our company server in master documents
- 8.1.3 A new module on the company's 3rd party Health & Safety Portal TM38 is now available and is now required to be completed by all employees

9 Breaches of the Policy

- 9.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 9.1.2 We may terminate our relationship with individuals and organisations associated with us, if found to be in breach of the Modern Slavery Act 2015.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending 2019