

Ref	XER-SLAV-001
Issue	01
Date	01/09/2024

SLAVERY AND HUMAN TRAFFICKING POLICY

This Policy Statement applies to all XER Schedule Toolkit Employees, Contractors and others who engage with XER Schedule Toolkit.

The Policy is in accordance with the Modern Slavery Act 2015 and relates to all of XER Schedule Toolkit's work activities and supply chain partners.

It sets out the steps XER Schedule Toolkit will take to ensure that slavery and human trafficking is not taking place in any of its dealings.

XER Schedule Toolkit's Policy in relation to slavery and human trafficking.

- **XER Schedule Toolkit does not permit, condone or otherwise accept any form of slavery and/or human trafficking (as defined in the Modern Slavery Act 2015) either by its employees, subcontractors, contractors, agents, partners or any other organisation, entity, body, business or individual with whom XER Schedule Toolkit engages or does business with.**
- **XER Schedule Toolkit is committed to preventing any form of slavery and/or human trafficking in its activities and to ensure that its Associated Parties are free from any form of slavery and/or human trafficking.**
- **In the event that XER Schedule Toolkit suspects any slavery and human trafficking by an Associated Party, we reserve the right to report such suspicions, provide appropriate information to the relevant authorities, and to suspend or terminate any associated engagement, business arrangement or contract.**
- **All XER Schedule Toolkit Subcontractors, Suppliers and other Associated Parties are required to provide details of the actions they are taking to ensure labour exploitation, slavery and human trafficking are not taking place in their operations or supply chain and permit XER Schedule Toolkit to audit its compliance to this Policy, including making records available to XER Schedule Toolkit to demonstrate compliance.**

XER Schedule Toolkit's due diligence processes in relation to slavery and human trafficking in its business and supply chains.

In order to ensure that no slavery or human trafficking is taking place within its supply chain, XER Schedule Toolkit shall:

- **Incorporate the Policy into XER Schedule Toolkit's Pre-Subcontract Appraisal for suppliers, subcontractors and partners.**
- **Publish the Policy on XER Schedule Toolkits website for public access.**
- **Incorporate the Policy into XER Schedule Toolkits on-line pre-approval questionnaire.**
- **Include an acceptance condition in XER Schedule Toolkits supplier Pre-Subcontract Appraisal document that suppliers must abide to the Policy.**

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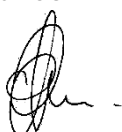
XER Schedule Toolkit's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.

The effectiveness of ensuring that slavery and human trafficking is not taking place in XER Schedule Toolkit's business or supply chains shall be assessed by application of the following key performance indicators:

- **To raise awareness of slavery and human trafficking by bringing the contents of the Statement and Policy to the attention of all employees by publishing it on the portal.**
- **Requirement to staff who induct new employees to introduce employees to the Policy.**
- **Incorporate supplier adherence to the Policy within XER Schedule Toolkit's supplier appointment process.**

The parts of XER Schedule Toolkit's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk

- **Suppliers and subcontractors: there may be a risk of slavery and/or human trafficking through organisations with whom XER Schedule Toolkit contracts for the supply of products or services, or through organisations with whom XER Schedule Toolkit subcontracts work to or partners with.**
- **The appointment of suppliers and subcontractors is subject to careful due diligence to ensure that there is no perceivable risk of slavery and/or human trafficking. XER Schedule Toolkit engages only with reputable suppliers or parties that do not engage in any form of slavery and/or human trafficking.**
- **All such parties are also expected to adhere to XER Schedule Toolkit's policy, which is incorporated into the process for being appointed as such and/or the relevant contractual relationship.**
- **XER Schedule Toolkit avoids contracting with suppliers or subcontractors which are located within geographical areas where slavery and/or human trafficking are a risk. In the event that the business contracts with suppliers or subcontractors outside of the United Kingdom, it shall assess the supplier/subcontractor and the relevant geographic area on a case by case basis, undertaking any necessary due diligence in accordance with the paragraph below.**



Name: Mr C Grosvenor

Title: Director

Date 1st September 2024

Review Date 1st September 2025