



## **ANTI-SLAVERY POLICY STATEMENT**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery, and 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 own business or in any of our supply chains.

**The Company is structured as follows: The work we do and our business operations are broadly split into two areas: Membership and Programmes & Initiatives. All departments are located in our Manchester Head Office. Our supply chains involve UK based organisations who deliver subcontract work or supply general organisation support or procurement.**

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes, in the coming year, we will 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 that our suppliers will 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. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **Due Diligence Processes**

**The Company is committed to taking reasonable steps to address the risks of modern slavery and human trafficking in our business and supply chains. We may, where appropriate, implement processes such as supplier assessments, risk evaluations for new and existing suppliers, and collaboration with third-party organisations to help ensure compliance with our anti-slavery standards. Additionally, we encourage our suppliers to complete modern slavery compliance questionnaires and to engage in ongoing monitoring, as needed, to support adherence to our policy.**

### **Risk Assessment and Management**

**We recognise that certain parts of our business and supply chains may present a higher risk of modern slavery and human trafficking. To address these risks, we aim**



**to implement appropriate measures, which may include targeted assessments, focused audits, and engagement with suppliers in higher-risk regions or industries. We strive to review and improve these measures as necessary to manage and mitigate risks related to modern slavery effectively.**

#### Responsibility for the policy

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Company has primary and 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.

Management 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 in supply chains.

**To gauge the effectiveness of our efforts in addressing modern slavery, we may consider a variety of performance indicators, such as the number of supplier assessments conducted, the extent to which suppliers participate in modern slavery compliance activities, and the feedback received from any third-party evaluations. We may also track the delivery of training sessions and the level of staff engagement in these programmes. These indicators are intended to help us review the progress of our initiatives and identify potential areas for improvement.**

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 Managing Director.

#### Compliance with the policy

You must ensure that you read, understand, and comply with this policy. 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. You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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 tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, 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.



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

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.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

Communication & 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 updates will be provided using established methods of communication between the business and you.

**We also offer ongoing training sessions and capacity-building initiatives aimed at increasing awareness and understanding of modern slavery among our staff. These sessions are tailored to different roles within the company and include specific content on identifying and addressing risks related to slavery and human trafficking in our supply chains.**

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.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Manchester Digital Modern Slavery Policy