What is slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- our supply chain;
- any outsourced activities,
- Recruitment

Responsibilities

The company, our managers and staff have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

The Company will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- be clear about our recruitment policy;
- check our supply chains;
- lead by example by making appropriate checks on all employees, suppliers, etc to ensure we know who is working for us;
- ensure we have in place an open and transparent grievance process for all staff and;
- seek to raise awareness so that our staff know what we are doing to promote their welfare.

Managers will:

- listen and be approachable to staff;
- respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- remain alert to indicators of slavery;
- raise the awareness of our staff, by discussing issues and providing information, so that everyone can spot the signs of trafficking and exploitation and know what to do and
- use their experience and professional judgement to gauge situations.

Staff also have responsibilities under this policy. Whatever your role or level of seniority, you must:

- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure;
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated and
- tell us if you think there is more we can do to prevent people from being exploited.

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The risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- supply chains and
- general recruitment

We manage these risk areas through our procedures set out in this policy.

Our procedures

COMBATING MODERN SLAVERY STATEMENT (DNX-06) We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We make this statement on our website.

CSR POLICY - Pektron's Commitment to Social Responsibility We believe in mutual respect and open, constructive dialog. We believe that upholding human rights and freedoms is essential to running a successful business. We make this statement on our website.

Supply Chains

As a part of our company's due diligence process all potential new suppliers undertake a rigorous approval process and we monitor our existing suppliers on a regular basis. We strive to only work with organisations who also commit to the eradication of slavery and human trafficking.
Assurance is sought from suppliers that they comply with the Modern Slavery Act 2015.
Pektron Group Ltd will not work with any organisation that either has or is found to be knowingly involved within either human trafficking or modern slavery.

Recruitment

General recruitment

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We always ensure staff are legally able to work in the UK.
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- We ensure that the person in possession of their legal documents (passport, identification and their own bank account details)
- We query if a worker does not have their own bank account.
- We are alert to a high number of people listing the same address.
- We are aware of appearance and behaviour and how it might be a cause for concern.

If, through our recruitment process, we suspect someone is being exploited, the Recruitment Manager will follow our reporting procedures.

Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim. Someone in slavery might:

- appear to be under the control of someone else and reluctant to interact with others
- not have personal identification on them
- have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- not be able to move around freely
- be reluctant to talk to strangers or the authorities
- appear frightened, withdrawn, or show signs of physical or psychological abuse
- dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

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This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

Reporting slavery

In the first instance raise your concerns with your immediate Supervisor

If you suspect that someone is in slavery, DO NOT confront them or cause a scene as this will likely lead to increased harm for them. Instead, inform relevant authorities or organisations working in the field.

If you are in the UK and suspect someone might be in slavery, you have several options:

- Call the Modern Slavery Helpline on 08000 121 700 or fill out an online form.
- Contact the Gangmasters and Labour Abuse Authority to report concerns about the mistreatment of workers on 0800 432 0804, or by email intelligence@glaa.gsi.gov.uk
- Contact Crimestoppers on 0800 555 111
- Contact the Police
- Contact Anti-Slavery International or other specialist anti-slavery organisations

Monitoring our procedures

We will review our Anti-slavery policy annually. We will provide information and/or training on any changes we make.

Other

This policy does not form part of any contract of employment and the Company may amend it at any time.

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