

Anti-Modern Slavery & Anti-Human Trafficking Policy ('this Policy')

Definition

Modern slavery is a term used to encompass: slavery; servitude; forced and compulsory labour; bonded and child labour; and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

1. Policy statement

1.1 This Policy applies to all persons working for Your Treasurer Ltd ('the Company') or working on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, stakeholders, contractors and direct suppliers.

1.2 The Company strictly prohibits the use of modern slavery and human trafficking in our business model and operations. The Company will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our direct supply chains associated with the business. We expect our direct suppliers to hold their own suppliers to the same high standards.

1.3 The Company is also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our direct supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

1.4 As part of our contracting processes, the Company's client agreements include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

1.5 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.

1.6 This Policy does not form part of any employee's Contract of Employment and may be amended by the Company at any time.

2. Responsibility for the Policy

2.1 The Board of Directors of the Company have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations, and that all those under its control comply with it.

2.2 The Managing Director has primary 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.

2.3 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.

2.4 All parties that are required to comply with the Policy are invited and encouraged to comment on its suitability and to suggest ways in which it might be improved. Any comments, suggestions and/or queries should be addressed to the Managing Director.

3. Compliance with the Policy

The Company requires everyone working with us, or on our behalf, to read, understand and comply with the following Policy commitments to safeguard against modern slavery and human trafficking.

- 3.1 Uphold our zero-tolerance approach to modern slavery and human trafficking in our organisation and in our direct supply chains.
- 3.2 The prevention, detection and reporting of modern slavery and human trafficking in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Those covered by this Policy must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy.
- 3.3 Concerns about any issue or suspicion of modern slavery or human trafficking in any parts of the business or direct supply chains of any supplier should be raised at the earliest possible stage. If a breach of this Policy is suspected to have occurred or may occur, the Company's Managing Director should be notified as soon as possible.
- 3.4 We are committed to engaging with our stakeholders, contractors and direct suppliers to address the risk of modern slavery in our operations and direct supply chains.
- 3.5 We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and human trafficked labour in our contracts with third parties. Using our risk-based approach we will also regularly assess the merits of writing to direct suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- 3.6 As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of our direct suppliers for their compliance with this Policy.
- 3.7 If we find that other individuals or organisations working on our behalf have breached this Policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.
- 3.8 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 business or in any of our direct supply chains.

4. Communication & Awareness of this Policy

Training on this Policy, and on the risk our business faces from modern slavery or human trafficking in our direct 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. Our zero-tolerance approach to modern slavery will be communicated to all direct suppliers, contractors and stakeholders at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. 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 as well as the contracts of direct suppliers, contractors and stakeholders if they breach this Policy.

(Next review date – 31st December 2026)