



## Anti-Slavery And Human Trafficking Policy – September 2024

### 1. Introduction

At The Wesley, we are committed to ensuring that modern slavery and human trafficking have no place in our business operations or supply chains. This policy reflects our commitment to acting ethically, with integrity and in full compliance with all legal requirements, particularly the Modern Slavery Act 2015. As a small-to-medium enterprise (SME) with under 80 employees, we acknowledge our responsibility to combat modern slavery in all its forms and ensure that we maintain a workplace and supply chain free from exploitation.

### 2. Scope

This policy applies to all individuals working for or on behalf of The Wesley, including employees, contractors, suppliers, and partners. Everyone is expected to uphold the principles outlined in this policy.

### 3. Our Commitment

We are committed to a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. We are dedicated to complying with all applicable laws, including the Modern Slavery Act 2015, to ensure that our operations do not contribute to or tolerate any form of slavery or human trafficking. We will take all reasonable steps to ensure that slavery or trafficking is not present within any part of our supply chain by assessing and mitigating risks.

### 4. Identifying Risks

We recognise that our company's size and scope may pose risks, particularly within our supply chains. To address this, we are committed to: Conducting due diligence on new suppliers and contractors to assess their compliance with anti-slavery measures. Regularly reviewing our supply chains to identify areas of higher risk, particularly in sectors or regions with a history of labour exploitation. Ensuring contracts with suppliers and partners include clauses that prohibit the use of forced or trafficked labour.

### 5. Responsibilities

**HR Department** - Responsible for ensuring that all recruitment practices, both internally and through agencies, comply with anti-slavery laws and that employees' rights are respected.

**Line Managers** - Ensure that all employees are treated with respect and are aware of their rights.

**All Employees** - Required to report any concerns related to slavery, human trafficking, or unethical behaviour in the workplace or supply chain.

### 6. Reporting and Whistleblowing

We encourage employees and suppliers to report any concerns or suspicions about modern slavery. Reports can be made confidentially through our Whistleblowing Policy. We will investigate all reports thoroughly and take appropriate action, which may include terminating contracts with suppliers who fail to comply.

### 7. Training

We are committed to ensuring that all employees, particularly those involved in procurement, recruitment, and supply chain management, are trained to understand the risks of modern slavery and how to recognise signs of human trafficking.

### 8. Monitoring and Review

This policy will be reviewed annually to ensure its effectiveness and compliance with legal obligations. We will continue to refine our processes to combat slavery and trafficking as necessary.

### 9. Breach of Policy

Any employee found to be in breach of this policy will face disciplinary action, which could lead to dismissal for gross misconduct. Similarly, suppliers or contractors found in violation of this policy will be subject to termination of their contracts.

### 10. Conclusion

The Wesley is fully committed to preventing modern slavery and human trafficking in any form. By implementing this policy, we aim to ensure a fair and ethical workplace for all employees and partners while promoting compliance throughout our business operations and supply chains.