

# MODERN SLAVERY POLICY



## SCOPE

All employees of the Anglian Group, together with any individual or organisation that works for or with the Company.

## POLICY

This Policy should be read in conjunction with our Modern Slavery Act Transparency Statement ([link](#)). Modern slavery encompasses slavery, servitude, human trafficking and forced labour and is a crime resulting in an abhorrent abuse of human rights.

Anglian has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place in any of our supply chains or any part of our business. We expect that our suppliers and sub-contractors will hold themselves and their own suppliers and sub-contractors to the same high standards.

We recognise that a focus on tackling modern slavery not only protects vulnerable workers and helps prevent and remedy human rights violations, it can also bring a number of business benefits including, enhancing the company's reputation and brand, growing the Company's customer base as more consumers seek out businesses with higher ethical standards, greater staff retention and loyalty based on values and respect and developing more responsive, stable and innovative supply chains.

Everyone who works for the Company has a responsibility to prevent and identify modern slavery in any part of our business or supply chains and must avoid any activity that is contrary to this Policy. We expect those who work for and with the Company to come forward promptly and voice their concerns should they have reason to suspect actual or potential issues with modern slavery in any of our supply chains or any part of our business.

The aims of this policy are to:

- Provide guidance with regard to identifying modern slavery;
- Explain the measures the Company is taking to prevent, identify and reduce any risk of modern slavery in its business and supply chains;
- Encourage individuals to report suspected instances of potential or actual modern slavery as soon as possible, in the knowledge that their concerns will

be taken seriously and investigated as appropriate, and that their confidentiality will be respected;

- Provide individuals with guidance as to how to raise those concerns; and
- Reassure individuals that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

## **IDENTIFYING MODERN SLAVERY - DEFINITIONS**

### **Slavery**

Slavery is the condition in which a person is owned as property by another who has absolute power over that person. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

### **Servitude**

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a person to live on another person's property and the impossibility of changing his or her condition.

### **Forced or Compulsory Labour**

Forced or compulsory labour involves coercion, either through the direct threat of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

### **Human Trafficking**

An offence of Human Trafficking is committed where a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. The exploitation of the potential victim does not need to have taken place for the offence to be committed.

## **RESPONSIBILITIES**

The Board of Directors has ultimate responsibility for the Policy and will:

- Uphold the Policy both in its letter and in spirit at all times;
- Ensure that guidance and training is provided to employees as appropriate to ensure that the terms of the Policy are applied;
- Review the effectiveness of the Policy and actions taken to counter modern slavery and in response to concerns raised under the Policy.

Directors, Managers and Supervisors will:

- Be responsible for the implementation and promotion of the Policy;
- Ensure that their staff are aware of their responsibilities under the Policy;
- Assist individuals to use the Whistleblowing Policy in the event that they present with a concern falling within its scope.

The Procurement Department will:

- Implement measures to prevent, identify, assess and reduce the risk of modern slavery in our supply chains in accordance with the Policy.

All Employees will:

- Comply with the letter and spirit of this Policy;
- Raise concerns falling within the scope of this Policy promptly.

Others – All other persons will be:

- Given access to a copy of this policy (e.g. prospective employees, self-employed partners, agency workers, customers, suppliers, sub-contractors of/ to the Anglian Group;
- At all times made aware of the standards of behaviour we expect from any individual, company or partnership or other organisation who/which works for or with the Company.

## **Modern Slavery Act Transparency Statement** ([link](#))

Our current Modern Slavery Transparency statement sets out the steps undertaken and planned during the financial year to ensure that modern slavery or human trafficking is not taking place in any of our supply chains and in any part of our own business.

This statement is published on our external Company website.

## **Raising a concern**

An individual raising a concern regarding an actual or potential issue with modern slavery should do so using the procedure set out in the Company's Whistleblowing Policy ([link](#)).

Concerns will be taken seriously, investigated as appropriate and the confidentiality of individuals who raise concerns will be respected.

If the concern relates to the actions of a third party, such as a supplier or sub-contractor, the law allows an individual to raise the concern with that third party where they reasonably believe it relates mainly to their actions or is something that is

legally their responsibility. However, we encourage individuals to report such concerns internally first.

Further information and guidance is available from the Whistleblowing Policy or the Company's Whistleblowing Officer whose contact details are at the end of this Policy.

If an individual is uncertain whether a suspected actual or potential issue constitutes modern slavery they should seek guidance from their manager or the Whistleblowing Officer.

The Modern Slavery Helpline is also able to provide information and guidance to anyone who thinks they may have come across an instance of modern slavery. Their contact details are at the end of this Policy.

### Protection and support for individuals who raise a concern

The Company will protect and support individuals who raise genuine concerns under the Whistleblowing Policy, even if they turn out to be mistaken. The Company guarantees that individuals will not suffer detrimental treatment from the Company as a result of raising a concern under the Whistleblowing Policy. The Company will also protect individuals from any detriment caused by or on behalf of aggrieved employees or other individuals.

Further information regarding the protection and support for individuals who raise a concern is available from the Whistleblowing Policy.

Any individual who believes that they have suffered any detriment by reason of raising a concern regarding an issue with modern slavery should inform the Whistleblowing Officer immediately.

## **Measures to prevent, identify, assess and reduce risk of modern slavery in our business and supply chains**

These include:

- Our zero-tolerance approach to modern slavery will be communicated to all employees together with any individual or organisation that works for or with the Company;
- Risk assessments will be carried out of the Company's suppliers and sub-contractors;
- Identified risks with existing and new suppliers or sub-contractors will be assessed and any appropriate action taken in accordance with the principles of the Modern Slavery Act;
- Relevant training will be provided to employees in identifying the signs of modern slavery and in implementing measures to prevent or minimise the risk of modern slavery in our business and supply chains as appropriate;

- Only reputable employment or recruitment agencies will be used to source agency workers;
- Appropriate identity checks will be carried out in accordance with our Prevention of Illegal Working Policy, to ensure that all new employees are eligible to work in the UK.

This Policy does not form part of any employee's or self-employed partner's contract and the terms may be amended by the Company from time to time at its sole and absolute discretion. The Company may also vary the procedure including any time limits as appropriate.

## Contacts

Whistleblowing Officer	Barry Chappell Group Company Secretary Anglian Windows Ltd PO Box 65 Norwich NR6 6EU  Tel: 01603 422520 (ext: 3020)
Modern Slavery Helpline	Tel: 0800 0121 700