



Anti-slavery Policy

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## Policy Overview

MV Kelly Ltd has a legal and moral duty to protect workers within the Company's business and supply chain. The Company has a zero-tolerance approach to slavery and Human Trafficking and is committed to acting ethically, and with integrity and transparency in all its business dealings and fulfil the obligations under the Modern Slavery Act 2015.

This policy outlines the company's stance on modern slavery and its expectations of other parties regarding slavery and human trafficking. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## Scope

This policy applies to all persons working for or on behalf of MV Kelly Limited in any capacity.

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

In the United Kingdom, the Modern Slavery Act 2015 describes what constitutes a crime in this area. It includes but is not limited to; holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

## Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. In addition, the board has responsibility for implementing and monitoring this policy to ensure its effectiveness in mitigating the risk of modern slavery.

A designated member of the management team will be responsible for investigating any allegations of modern slavery in the Company's business or supply chains.

The management team has day to day responsibility for ensuring all other employees reporting to them understand and abide by this policy.

This policy is reviewed and approved on an annual basis by the Board of Directors.

## Signs of Slavery and Human Trafficking

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. The most straight forward way to tackle slavery and human trafficking is for all associates to carry out due diligence within their supply chain and be vigilant for the common signs of slavery and human trafficking:

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.

## Compliance

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

In addition, the company also expects all its suppliers, contractors, and other business partners to exercise the same level of vigilance with their own operations.

If you believe or suspect that this policy has been breached or the law has been broken, you must raise this with either your line manager, anyone in the management team or a director as soon as possible. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. Any employee who has concerns on who to report it to can also refer to the Whistleblowing policy.

Alternatively, a report can be made through one of the organisations below:

- Modern Slavery Helpline on 08000 121 700 or online at [www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)
- Crimestoppers on 0800 555 111 or online at <https://crimestoppers-uk.org/give-information/forms/give-information-anonymously>

MV Kelly Ltd is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

### **Training and communication**

Regular training on this policy, and on the risk that the company faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners when entering new or renewed contracts with them.

### **Breach of policy**

Any employee or associate who is found to have not acted ethically or to have possibly committed an offence under the Modern Slavery Act 2015 may be considered in breach of this policy.

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The company may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Additionally, if applicable, MV Kelly Ltd will forward any concerns or findings directly to the police, which could result in serious penalties and potential criminal charges under the Modern Slavery Act 2015.