

PREVENTION OF MODERN SLAVERY POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including when one person:
- holds another person in slavery or servitude,
 - requires another person to perform forced or compulsory labour, or,
 - arranges or facilitates the travel of another person with a view to them being exploited (human trafficking).
- In all cases it involves the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 We have a zero-tolerance approach to modern slavery and to that end we are fully committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.3 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.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Compliance Manager for modern slavery prevention is the Sustainability Manager. The Compliance Manager, with support from the Head of Coffee & Quality, has primary and day-to-day 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 You must ensure that you read, understand and comply with this policy. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. To complement this, adequate information and training on the prevention of modern slavery should be made available to all employees, with particular priority given to those with responsibility for hiring new employees and working in partnership with our suppliers.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

3. OUR COMMITMENTS

- 3.1 In order to enforce our zero-tolerance approach to modern slavery in our business and supply chains, we:
- (a) Commit to ensure that all employees have the following freedoms:
- Freedom of Employment: All workers shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.
 - Termination of Employment: Workers shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length (in accordance with national law or collective agreement) at any time without penalty. Workers on contracts of fixed duration shall not be required to serve beyond the expiry of their contract. Matthew Algie shall not use means to restrict a worker's ability to terminate employment, for example by requiring deposits, withholding employee documentation, threats or use of violence, imposing financial penalties or requiring payment of recruitment fees.

- Threat of Violence, Harassment & Intimidation: Matthew Algie shall not exact work or service from any person under the menace of any penalty. This includes the use or threat of physical or sexual violence or harassment.
 - Freedom of Movement: Coercion shall not be used to physically confine or imprison workers to the workplace or related premises.
 - Compulsory overtime: Workers shall not be forced to work overtime above the limits permitted in national law and collective agreements under the menace of a penalty, for example the threat of dismissal.
- (b) Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
 - (c) Comply with the relevant legislation in the UK for minimum working age. Worker age is checked by HR/ Payroll Administrator through ID documentation at job offer stage in the recruitment process.
 - (d) Never use coercion via wage payments, including debt bondage or bonded labour, to bind workers to employment.
 - (e) Never include sanctions resulting in an obligation to work as part of our disciplinary measures.
 - (f) Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. If an exception is made, it should be in the interest of the workers concerned, and after consulting the most representative organisations of employers and workers. All costs related to recruitment should be disclosed to the workers.
 - (g) Never retain personal documents (e.g. work permits, passports, drivers licence, bank cards) for the purpose of binding workers to employment.
 - (h) Expect all of our contractors, suppliers and other business partners to also instil a zero-tolerance approach to modern slavery. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
 - (i) Only choose to work with labour providers who adopt policies and procedures consistent with our own high standards as stipulated in our co-signed Service Level Agreement. We audit our labour providers annually to ensure ongoing compliance with these terms.
 - (j) Ask all employees to report or raise concerns about any issue or suspicion of modern slavery (see Section 4 and our *Procedure for Internal Reporting and Dealing with Suspected and Identified Modern Slavery*). In response, we shall investigate and act on reports of modern slavery in our business and supply chains swiftly and appropriately. This includes proactively reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.

4. PREVENTION THROUGH DETECTION AND REPORTING

- 4.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.2 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains (of any supplier tier) at the earliest possible stage. This includes when you suspect that an instance of modern slavery has occurred, or may occur in the future. In such instances, it is your responsibility to follow the instructions for reporting your suspicions laid out in the *Procedure for Internal Reporting and Dealing with Suspected and Identified Modern Slavery*.
- 4.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith, 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 own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a member of the HR department immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure, which can be found in our Employee Handbook.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training and information is provided as necessary.
- 5.2 Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. BREACHES OF THIS POLICY

- 6.1 You must notify your line manager as soon as possible if you suspect that there has been a breach of this policy, or that there may be a breach in future.
- 6.2 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 if they breach this policy.



Ewan Reid
Managing Director

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