



montrose

Improving lives through evidence and impact

Anti-Slavery and Human Trafficking Policy April 2022

CONTENTS

1. INTRODUCTION	2
2. UK MODERN SLAVERY ACT (2015)	2
3. PRINCIPLES OF ANTI-SLAVERY AND HUMAN TRAFFICKING	3
3.1. Responsibility	3
3.2. Supply chain	3
3.3. Recruitment and training	3
3.4. Monitoring and updates	4
4. IMPLEMENTING THIS POLICY	4
5. RAISING AND RESPONDING TO CONCERNS	4
6. CONSEQUENCES OF BREACHING THIS POLICY	4

AMENDMENT LOG

Issue date	Version no.	Summary of addition or alteration	Initials
October 2018	V1	Anti-Slavery and Human Trafficking Policy first authorised issue	BB
November 2019	V2	Formatting/design updated	GH
January 2021	V3	Date, version number and document number updated New company logo inserted	GH
April 2022	V4	Date, version number and document number updated. Alignment to new Modern Slavery Statement added	BB

What is modern slavery and human trafficking?

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 and human trafficking are a crime and a violation of fundamental human rights

1. INTRODUCTION

Provision 54 of the Modern Slavery Act (2015) came into force on 29 October 2015. It requires commercial organisations in any sector with a global annual turnover of GBP 36 million or more which do business in the UK to disclose (in an annual Slavery and Human Trafficking Statement), the steps they are taking to address modern slavery in their business and supply chain. While Montrose is smaller than this required threshold, we are committed to the principles within the Modern Slavery Act and this policy aims to outline steps taken to uphold these. Our Modern Slavery Statement can also be found at <https://montroseint.com/modern-slavery-statement>.

Montrose strictly prohibits the use of modern slavery or human trafficking in our operations and supply chain. We have and 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 supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

The following policy document strictly applies to all employees, consultants, sub-contractors and any person or company acting for or on behalf of Montrose within all regions, areas and functions.

For the avoidance of doubt, if you are in any way acting for or on behalf of Montrose, all aspects of this policy apply to you.

2. UK MODERN SLAVERY ACT (2015)

The UK Modern Slavery Act (2015) makes "provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-Slavery Commissioner; and for connected purposes"¹.

Key provisions within the act include:

- **Slavery, servitude and forced or compulsory labour.** An offence is committed if (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

¹ Please see <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted> for the full Act.

- **Human trafficking.** A person commits an offence if the person arranges or facilitates the travel of another person ("V") with a view to V being exploited. It is irrelevant whether V consents to the travel (or whether V is an adult or a child).
- **Exploitation** could include: slavery, servitude, forced or compulsory labour, sexual exploitation, removal of organs, securing services by force, threats or deception, or securing services from children and/or vulnerable persons.

3. PRINCIPLES OF ANTI-SLAVERY AND HUMAN TRAFFICKING

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to:

- acting ethically and with integrity in all our business relationships;
- implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business (including our supply chains).

We shall be a company that expects everyone to support and uphold the following measures to safeguard against modern slavery, human trafficking and exploitation:

3.1. Responsibility

- Montrose has a zero-tolerance approach to modern slavery, or any form of exploitation or abuse of power in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is our collective responsibility. You must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

3.2. Supply chain

- Montrose is committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- Montrose will ensure that all sub-contractors and partners are informed and in compliance with our Anti-Slavery and Human Trafficking Policy. When working with or through partners or subcontracted agencies, Montrose will ensure that their anti-slavery and human trafficking policies and procedures are consistent and in line with the principles and approaches set out in this policy.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with this Anti-Slavery and Human Trafficking Policy as part of their compliance with our Code of Conduct.

3.3. Recruitment and training

- Montrose will ensure that employees, consultants and individuals working on behalf of Montrose are given a copy of this Anti-Slavery and Human Trafficking Policy and inducted in on the standards we expect as part of the Ethical Conduct training.
- Routine Ethical Conduct training will be available to all staff (and consultants at the start of a contract).
- If you have any doubts around how to identify or report a suspected breach of this policy or the UK Modern Slavery Act, please contact your line manager or the Director of Finance and Administration, who will provide 1:1 support.

3.4. Monitoring and updates

- Montrose commits to monitoring the implementation of this Anti-Slavery and Human Trafficking Policy, which will be reviewed every year and earlier if necessary, to ensure it remains appropriate and up-to-date.
- If Montrose finds 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.

4. IMPLEMENTING THIS POLICY

There are several ways in which Montrose will ensure this policy is implemented:

- Each programme Risk Register will include risks and mitigation measures in relation to anti-slavery principles.
- As part of the due diligence process and background checks for both all consultants and suppliers, the programmes team will review the potential for any breach of the anti-slavery principles. Should there be any suspicion, this will be fully investigated. Montrose will not offer a contract until the investigation is complete and, as far as possible, certainty ascertained that there is no risk or history which linked the individual or supplier to slavery or human trafficking.
- All Montrose employees, consultants, and suppliers will be trained on the Montrose Safeguarding Policy, which includes an overview of the anti-slavery principles, and provides clarity on the process for reporting any concerns.

5. RAISING AND RESPONDING TO CONCERNS

Montrose places a mandatory obligation on all employees, consultants, sub-contractors, partners and anyone working on behalf of Montrose to report concerns, suspicions, allegations and incidents which indicate actual or potential instances of slavery or human trafficking, or which suggests this policy may have in any way been breached. This should be done through the appropriate channels as outlined in the Montrose Whistleblowing Policy.

Concerns should be raised with an individual's line manager, functional lead or one of the Designated Safeguarding Officers who will initiate the necessary procedures for dealing with suspected or actual incidents of abuse.

The Senior Management Team is responsible for ensuring the reporting and investigation procedure outlined in the Montrose Whistleblowing Policy is followed so that suspected or actual cases of slavery or human trafficking are responded to appropriately and referred to the relevant statutory authority immediately.

6. CONSEQUENCES OF BREACHING THIS POLICY

Any breach of this Policy is a serious offence and will be treated as such. Therefore, an employee, consultant, sub-contractor or any person or company acting on the behalf of Montrose in breach of this policy would face disciplinary action, including dismissal and appropriate legal action.