# Anti-Slavery and Human Trafficking Policy

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## 1. About this policy

This policy applies to all persons working for Soundabout or on our behalf in any capacity, including employees at all levels, directors, officers, freelance practitioners, agency workers, seconded workers, volunteers, agents, contractors and suppliers. Soundabout strictly prohibits the use of modern slavery and human trafficking in its operations and services. 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 services. We expect that our suppliers will hold their own suppliers to the same high standards.

This policy should be used in conjunction with the Soundabout Safeguarding Policy.

## 2. Definitions

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 is a crime and a violation of fundamental human rights.

## 3. Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our services.
- The prevention, detection and reporting of modern slavery in any part of our organisation or services is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and services.
- We will take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. We will also assess the merits of writing to suppliers asking them to confirm their position in respect of combating modern slavery and trafficking. Consistent with our risk-based approach we may require:
    - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
    - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code of Conduct
    - Our review process encourages increased attention to our supplier relationships.
- 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 our Code of Conduct. If we find 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.

## Review

| | Date | Completed by |
|---|---|---|
| **First Written** | **May 2023** | **Maryse Degbegni (from solicitor – 'supply chain' replaced by 'services')** |
| **Trustee Approval** | **May 2023** | **Yogesh Dattani** |
| **Next review date** | **April 2026** | |
| **Revisions** | | |
| | | |

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