

Human Rights & Modern Slavery

Policy Statement

Modern slavery is defined as a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“modern slavery”), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Atlantic House Group has a zero-tolerance approach to modern slavery within its business and supply chains. We believe that every human being has the fundamental right to be treated with respect and to be paid a fair wage for the work that they undertake.

This policy applies to all persons working for Atlantic House Group or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, consultants and suppliers. Atlantic House Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain under Section 54 of the Modern Slavery Act 2015. 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.

Modern Slavery and Human Trafficking examples:

- Domestic Servitude - Employees working in private homes are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
- Sex Trafficking - Women, men or children that are forced into the commercial sex industry and held against their will by force, fraud or coercion.
- Forced Labour - Human beings are forced to work under the threat of violence and for no pay. These slaves are treated as property and exploited to create a product for commercial sale.
- Bonded Labour - Individuals that are compelled to work in order to repay a debt and unable to leave until the debt is repaid.
- Child Labour - Any enslavement — whether forced labour, domestic servitude, bonded labour or sex trafficking — of a child.
- Forced Marriage - Women and children who are forced to marry another without their consent or against their will.

Signs of Modern Slavery or Human Trafficking

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- The person allows others to speak for them when spoken to directly.
- The person is dropped off and collected from work.
- The person is withdrawn or appears frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.

All members of Atlantic House Group's team are briefed on these indicators and instructed to remain watchful for any of the above signs when engaging with any of our suppliers.

While modern slavery can be found in all countries and industries, we acknowledge that there is a heightened risk with:

- domestic and international migrant labour.
- contract, agency, and temporary workers.
- vulnerable populations such as refugees.
- young, or student workers.

Our processes focus on listening to employee's and workers' perspectives about their employment or supplier contracts to drive improvement. This is so we can offer continuous improvements across our organisation as we are committed to the equal treatment of our workforce and suppliers.

Due Diligence framework

Atlantic House Group operates a due diligence framework to ensure that we are consistent in our modern slavery and human trafficking approach to avoid inappropriate exploitation of our workforce and the workforce of our suppliers. We provide e-Learning training for all staff on an annual basis, made available on our internal Intranet the Home Office Modern Slavery Awareness Booklet and have a Modern Slavery and Human Trafficking Statement on our website.

Reporting Modern Slavery

Atlantic House Group employees must report any incidence or suspicion of modern slavery at the earliest possible stage to their Line Manager. Alternatively, if you are a supplier and have cause for your concern, your primary business contact with Atlantic House Group is the Head of Compliance and you should report any concerns to them.



Breaches of this policy

Any member of the Atlantic House Group who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

If a supplier is found to be in breach of this policy then Atlantic House Group may terminate its relationship with a supplier or issue an improvement notice which will confirm the steps that Atlantic House Group requires the supplier to take in order to remedy any issues and the time frame in which those improvements must be made.

Policy Review

Atlantic House Group is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice. This policy does not form part of any contract of employment and may be amended at any time.