



Group Modern Slavery Policy

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Contents

Introduction	3
Purpose and scope	3
Policy and procedures	3
Employment	3
Supply chain	4
Reporting Slavery	4

Introduction

Modern slavery is a crime and a violation of fundamental human rights. We recognise this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all have which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The UK Coaching Group is committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with the Modern Slavery Act 2015 (the Act). We expect the same high standards from all our suppliers, contractors and other third parties.

Purpose and scope

The aim of this policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We will adopt procedures that contribute to ensuring that modern slavery does not operate in our business or our supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the Act.

This policy is applicable to everyone working for the UK Coaching Group, including external consultants, agency contract workers, those on secondment from other organisations and suppliers' seconded workers.

Policy and procedures

We support colleagues and suppliers to address issues arising from modern slavery. Our Vision and Behaviours underpin our culture and how we do business. This includes being inclusive and collaborative, and always acting with integrity.

We ensure:

- Our Behaviours, which are embedded throughout our business, set the parameters for how we expect colleagues to behave with each other, suppliers, members and the world at large.
- We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted.
- Our policies and procedures relating to the Act are in line with our culture and behaviours.

We will work to ensure that modern slavery does not occur in our business or supply chain through raising the awareness of all members of staff and ensuring that everyone knows what to look for and what to do when they suspect modern slavery is present.

Employment

We are committed to providing an equitable, fair and supportive working environment for all our staff. We aim to ensure that all our policies are completely inclusive to the needs of all sectors of the population. All opportunities for employment and career progression will be offered irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender or sexual orientation (the nine protected characteristics as specified in the Equality Act 2010).

We operate a robust recruitment processes in line with UK employment laws, including 'right to work' document checks; contract of employment and checks to ensure that everyone employed is aged 16 and above and provide market-related pay and rewards, reviewed annually.

Supply chain

Whilst we consider our exposure to slavery/human trafficking to be relatively limited, we recognise that our business is exposed to greater risk when dealing with suppliers, particularly those who have operations/suppliers in other countries.

We will manage and mitigate these risks by:

- Informing all companies that we do business within the bounds of this policy;
- Seeking confirmation, from existing suppliers, that they comply with the Act; and
- Inserting a specific compliance clause into all new supplier contracts.

Reporting Slavery

We each have a responsibility in the prevention, detection and reporting of modern slavery. Colleagues who have concerns about any issue of suspicion of modern slavery in any part of our organisation or supply chains of any supplier should report them at the earliest possible stage. This should be done in accordance with the whistleblowing policy or by contacting the Head of HR. External third parties with concerns should notify the Chief Operating Officer. Anyone raising genuine concerns in good faith under this policy will be supported, even if they turn out to be mistaken.

If you are unsure about whether your concerns constitute a risk of modern slavery, you could seek advice from The Modern Slavery Helpline on **08000 121 700** or find out more at <https://www.modernslaveryhelpline.org/about/background>