



Modern Slavery and Human Trafficking Policy

Policy Statement

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights

Walker Sime Ltd have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships

We expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

What is Modern Slavery and Human Trafficking?

Trafficking involves the transportation of persons in the UK in order to exploit them by the use of force, violence, deception, intimidation, coercion or abuse of their vulnerability. The form of exploitation includes sexual and bonded labour exploitation and servitude. Those who are trafficked have little choice in what happens to them and usually suffer abuse due to the threats and use of violence against them and/or their family, or through debt bondage.

The Modern Slavery Act 2015

An overview of the Act:

- Enables the Secretary of State to make regulations relating to the identification of and support for victims
- Introduces a new reparation order to encourage the courts to compensate victims
- Introduces a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- Closes gaps in the law to enable law enforcement to stop boats where slaves are suspected of being held or trafficked
- Requires businesses over a certain size and threshold to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chain.



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Responsibility for implementation

The Directors and senior management team of Walker Sime Ltd have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third party business partners)

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Compliance

Any employee of Walker Sime Ltd must:

- Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;
- Notify their line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and
- 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.

Breaches of Policy

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, organisations and/or suppliers working on our behalf if they breach this policy.

Ongoing Review

Walker Sime Ltd will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.





OUR PEOPLE HONESTY & RESPECT PASSION PROFESSIONAL PRIDE IN WHAT WE DO FUN & PROACTIVE



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Signed by:

DWB *JS*

COMPILED BY:	DATE	REVIEW DATE	VERSION
CAROLINE BACON	23/01/2018	23/01/2019	1

