



<b>Policy:</b>	<b>Modern Slavery &amp; Human Trafficking</b>	<b>Reference:</b>	<b>MSHTSES0078</b>
		<b>Review Date:</b>	<b>11/2022</b>

### **Purpose.**

This policy aims to set out SES Engineering (Newark) Ltds policy in relation to Modern Slavery & Human Trafficking.

### **Definitions.**

<i>Slavery</i>	Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.
<i>Servitude</i>	Is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his/her condition.
<i>Human Trafficking</i>	An offence of Human Trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to travel. This reflects that the victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed.
<i>Forced or Compulsory Labour</i>	Labour involving coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

*Modern slavery is a crime and a violation of fundamental human rights.*

### **Scope.**

The policy applies to employees directly employed by SES Engineering (Newark) Ltd, to workers employed via agencies, contractors in terms of employment and customers in terms of service provision.

### **Responsibilities.**

SES Engineering (Newark) Ltd expects everyone collaborating with us or on behalf of 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 supply chains.
- We will not use forced or compulsory labour, i.e., any work or service that an employee involuntarily, under threat of penalty.
- Will comply with the minimum age requirements prescribed by applicable laws.
- We will compensate workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will not engage in any practice of slavery, servitude, child labour, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
- Will ensure that any sub-contractors or suppliers from whom we source goods and/or services for incorporation in those supplied to SES Engineering (Newark) Ltd, also adhere to these requirements.

### **Due diligence processes for Human Slavery and Trafficking.**

To ensure that all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme which consists of the following:



- Supplier must, on request certify their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.
- Suppliers must be able to provide details of the steps they are taking within their own businesses and supply chains to ensure that they are free from slavery and human trafficking.

### **Supplier Adherence to our values.**

SES Engineering (Newark) Ltd periodically audits to ensure adherence to its values and suppliers are expected to fully co-operate with any such audit. Suppliers who are found to have engaged in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this statement will be liable to have any supply agreement, arrangement or other contract with SES Engineering (Newark) Ltd terminated immediately.

### **Reporting & Consequences.**

Any breach of this policy (including by a supplier) can be reported (in confidence, if required) by contacting management.

SES Engineering (Newark) Ltd takes any breach of this policy extremely seriously and will also take such other (remedial) steps as the company deems necessary to address the violation and seek to prevent its reoccurrence.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.