



Primary Goal

Modern Slavery Policy

1. Introduction

Primary Goal is committed to preventing modern slavery and human trafficking in all areas of our business and supply chains. We acknowledge our responsibility to comply with the Modern Slavery Act 2015 and to be vigilant in ensuring there is no modern slavery in our operations or those of our partners and suppliers.

2. Scope

This policy applies to all Primary Goal employees, contractors, suppliers, and business partners. It outlines our commitment to ethical practices and our approach to identifying, preventing, and addressing modern slavery risks.

3. Our Legal Obligations

Under the Modern Slavery Act 2015, organisations carrying on a business in the UK with an annual turnover of £36 million or more must publish a modern slavery statement.

While the Act does not mandate Primary Goal, we voluntarily adopt these principles to uphold best practices and ethical standards.

4. Our Commitment

- To conduct risk assessments across our operations and supply chains (Modern Slavery Risk Assessment – Appendix 1).
- To ensure recruitment and employment processes are ethical, transparent, and coercion-free.
- To work with suppliers and partners who share our values and comply with anti-slavery legislation.
- To provide training and guidance to staff to help identify and report concerns.
- To implement appropriate due diligence processes for supplier and partner evaluation.

5. Supply Chains

We expect all suppliers to adhere to the principles of this policy. Primary Goal will take steps to assess and manage risk in our procurement processes. It may terminate relationships with suppliers who are unable or unwilling to meet our standards regarding modern slavery.

6. Training and Awareness

All staff will receive guidance to help them recognise the signs of modern slavery and understand how to report concerns. Training will be integrated into onboarding for new staff and refreshed periodically for existing employees.

7. Reporting Concerns

Primary Goal encourages reporting any suspicions or concerns related to modern slavery. Reports can be made confidentially to a line manager, the HR department, or via our whistleblowing procedure. Concerns will be investigated promptly and sensitively.

8. Review and Accountability

This policy is reviewed annually by the Board and may be updated in line with legislation or organisational structure changes. The Primary Goal Board for ensuring implementation, monitoring effectiveness, and reporting annually to the Board.

Appendix 1

Modern Slavery Risk Assessment

1. Purpose

This risk assessment template is designed to support Primary Goal in identifying, assessing, and managing risks associated with modern slavery within our internal operations, supply chains, and partner organisations.

2. Scope

This assessment should be completed for all high-risk suppliers, contractors, and operational areas. It may be used during onboarding, audits, or routine compliance checks.

3. Organisation / Supplier Details

Name of Organisation:

Type of Supplier/Partner:

Location(s) of Operation:

Assessment Date:

Completed By:

4. Risk Assessment

Risk Area	Risk Indicator / Concern	Initial Risk Rating (High/Med/Low)	Mitigation / Controls in Place	Residual Risk Rating
Recruitment Practices				
Worker Pay and Conditions				
Contractor Management				

Third-Party Labour Providers				
Geographical Risk (e.g. overseas labour)				
Training and Awareness				
Policy & Governance Compliance				
Worker Grievance and Reporting Channels				

5. Overall Assessment Summary

Overall Risk Level:

Recommended Actions / Follow-up:

Reviewed By (Name and Role):

Review Date:

6. Notes and Guidance

This assessment should be reviewed annually or in response to significant operational or supply chain changes. Any identified high-risk indicators must be escalated to the senior leadership team and reviewed by the safeguarding or compliance team.