

Modern Slavery and Human Trafficking Policy

Salterton Associates Limited

1. Purpose

1.1 Salterton Associates Limited (“Salterton”) is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This policy sets out our approach to identifying, mitigating and addressing risks, and reflects our ethical standards and legal obligations under the UK Modern Slavery Act 2015.

2. Requirements and Responsible Business

2.1 Our business does not presently fall within the category required to publish a Modern Slavery Statement. We are, however, committed to identifying, investigating and eliminating any possibility of ourselves or anyone in our supply chain from knowingly or otherwise participating to any extent in modern slavery.

2.2 This policy supports our modern slavery statement by providing guidance on how to act to prevent and detect modern slavery and human trafficking.

3. Scope

3.1 This policy applies to:

- All employees, directors, associates and sub-contractors
- All suppliers, contractors and business partners
- All operations in the UK and overseas

3.2 This policy should be read in conjunction with the following policies.

- Bribery and corruption policy
- Safeguarding policies
- Violence against women and girls’ policy
- Vetting and Disclosure and Barring policy
- Whistleblowing policy
- Disciplinary policy

4. What is Modern Slavery and Human Trafficking?

4.1 Modern slavery is the exploitation of individuals through slavery, servitude, forced or compulsory labour.

4.2 Human trafficking is where a person is controlled or coerced and unable to leave due to threats, abuse or deception.

5. Statutory Definition

5.1 Modern slavery is not a single offence but an umbrella term covering the following key offences:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking

5.2 UK Parliament and Home Office guidance further describe modern slavery as:

“a brutal form of organised crime in which people are treated as commodities and exploited for criminal gain”

6. Our Commitment

6.1 Salterton Associates Ltd have zero tolerance for modern slavery, including:

- Forced or compulsory labour
- Human trafficking
- Child labour
- Servitude and exploitation

6.2 We are committed to:

- Acting ethically and with integrity in all business dealings
- Implementing effective systems and controls to minimise risk
- Ensuring transparency within our organisation and supply chains
- Encouraging our partners to meet the same high standards
- Proactive due diligence

7. Governance and Responsibility

7.1 Company Directors have overall responsibility for this policy and risk oversight.

7.2 All staff and associates are responsible for complying with this policy and reporting concerns.

7.3 Responsibility for implementation, monitoring and review sits with the Salterton Steering Group.

8. Risk Assessment

8.1 We recognise that risks may arise:

- In all jurisdictions globally, but particularly in higher risk regions where modern slavery and human trafficking are particularly prolific
- In all operations, both nationally and internationally
- Where labour practices are less regulated or transparent
- Through complex or extended supply chains

8.2 We conduct periodic risk assessments to:

- Identify areas of potential exposure
- Evaluate suppliers and partners by risk profile and through due diligence research
- Inform proportionate mitigation actions
- To inform our modern slavery statement which we publish on our website

9 Due Diligence and Supply Chain Controls and Procedures

9.1 We apply a risk-based due diligence approach, including:

9.1.1 Pre-engagement checks

- Screening of all suppliers, associates and contractors
- Verification of business legitimacy and ethical practices

9.1.2 Contractual requirements

- Compliance with all applicable labour laws
- Adherence to the Modern Slavery Act 2015 (or equivalent legislation)
- Commitment to ethical labour standards

9.1.3 Ongoing monitoring

- Periodic review of supplier performance
- Assessment of compliance with policy obligations

9.2 We reserve the right to terminate relationships where concerns arise.

10. **Employment Standards and Worker Protections**

10.1 We ensure that all individuals working for or with Salterton:

- Are paid fairly and above the UK Living Wage (where applicable)
- Work voluntarily and are free to leave without penalty
- Retain possession of their identification documents
- Are not subject to recruitment fees or unlawful deductions
- Are not subject to restrictive practices preventing external work

10.2 We expressly prohibit:

- Forced or bonded labour
- Child labour
- Exploitative practices

11. **Training and Awareness**

11.1 We promote awareness by:

- Providing guidance to employees and associates
- Ensuring employees and associates read and understand this policy
- Ensuring decision-makers understand risks and responsibilities
- Embedding expectations through internal communications

11.2 We draw on associate expertise by;

- Ensure our associate experts inform our policies, procedures and internal processes
- Harness the knowledge, skills and experience of our associates who deliver modern slavery and human trafficking consultancy work for Salterton to upskill other associate/consultants to create an organisational culture of awareness
- We partner with expert organisations in this area of practice who we utilise to keep our knowledge in this area current and responsive to changes in risk, method and impact

11.3 Training is reviewed and updated regularly.

12 Reporting and Whistleblowing

12.1 All stakeholders to this policy are reminded that modern slavery and human trafficking are serious offences and are prohibited by law. The first consideration of all stakeholders should be their overarching duty to assist with the prevention and detection of offences to reduce human misery and harm. It is therefore an explicit expectation that all incidents are reported to the most appropriate authority. In most cases this is the police.

12.3 Salterton Associates also partner with Crimestoppers Trust, who are a UK charity that works to prevent and detect crime by enabling any person to make an anonymous crime report. This includes matters relating to police integrity and anti-corruption. Details of how to make an anonymous report are included in our bribery and corruption policy. Reporting human trafficking and modern slavery to Crimestoppers remains an option, where police corruption or integrity issues are suspected.

12.2 Where concerns relate to the operations of Salterton, this policy should also be read in conjunction with our Whistleblowing Policy.

12.3. Our overall approach to reporting and whistleblowing encourages openness, curiosity and accountability.

12.4 Where concerns are raised about Salterton, any supply chain contractor or subcontractor, or partner of the company – all directors, employees, associates, business stakeholders or community members should feel confident to raise concerns confidentially via our whistleblowing email channel which is detailed in our whistle blowing policy.

12.5 Reports can be made anonymously.

12.6 All concerns are taken seriously and investigated appropriately. All investigations are to be conducted by the Chief Executive Officer. If concerns are raised about the Chief Executive Officer, an independent investigator will be appointed to investigate concerns.

12.7 We strictly prohibit retaliation against anyone who raises a genuine concern.

13. Non-compliance

13.1 Failure to comply with this policy may result in:

- Disciplinary action
- Termination of self-employment contract
- Termination of business contracts or business relationships

14. **Monitoring, review and Continuous Improvement**

14.1 We commit to:

- Regularly reviewing the effectiveness of our controls
- Updating procedures in response to emerging risks
- Strengthening supply chain oversight as our business grows

14.2 We will review this policy biennially and updated as necessary to reflect:

- Changes in legislation
- Business growth and geographic expansion
- Evolving best practice

Policy Backing Sheet: Modern Slavery and Human Trafficking Policy

Approved Date: 19th May 2026

Approved By: Chief Executive Officer – Ian Tyers

Changes and Date Approved	Next Review Date
	May 2028