

Modern Slavery & Human Trafficking Policy

Drake & Morgan is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

Drake & Morgan acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within the organisation.

As part of Drake & Morgan's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. Drake & Morgan will not support or deal with any business knowingly involved in slavery or human trafficking.

The CEO and senior management take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

What is slavery?

The Modern Slavery Act (MSA) 2015 covers four activities and this policy covers all four activities:

- Slavery - Exercising powers of ownership over a person
- Servitude - The obligation to provide services is imposed by the use of coercion
- Forced or compulsory labour - Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
- Human trafficking - Arranging or facilitating the travel of another person with a view to their exploitation

How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not. At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more. With this in mind, we need to pay particularly close attention to our supply chain, any outsourced activities, particularly to jurisdictions that may not have adequate safeguards, cleaning and catering suppliers & corporate hospitality.

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chains comply with our values we are putting in place a supply chain compliance programme that will require our suppliers to confirm that they have a slavery and human trafficking policy in place and that they require the same from their suppliers.

Responsibilities of the company

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- Be clear about our recruitment policy
- Check our supply chains
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- Ensure we have in place an open and transparent grievance process for all staff
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- Make a clear statement that we take our responsibilities to our employees and our clients seriously

Managers responsibility

Managers will:

- Listen and be approachable to colleagues
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- Remain alert to indicators of slavery
- Raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- Use their experience and professional judgment to gauge situations We all have responsibilities under this policy.

Colleagues responsibility

Whatever your role or seniority, you must:

- Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- Tell us if you think there is more we can do to prevent people from being exploited

The risks

The principal areas of risk we face, related to slavery and human trafficking, include the employment of subcontractors and suppliers where their work practices may be non-compliant such as: The use of agency workers and contractors for labour intensive activities; Subcontractor packages with high labour content; Subcontractors engaged at low rates of pay; Purchasing of materials at low prices.

We manage these risk areas through our procedures set out in this policy and elsewhere.

Our procedures

Anti-slavery statement

We have a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We make this statement as part of our company reporting and have a legal duty to publish this statement on our website.

The policies we have in place and this anti-slavery statement, reflect our commitment to:

- Paying people fairly and properly for their work;
- Acting ethically and with integrity in all our business relationships and;
- Enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

We have a whistleblowing policy in place and, as part of our efforts to identify and mitigate risks within our supply chain, we are introducing systems to identify, assess and monitor potential risk areas.

Our statement

We are an independent multi-disciplinary hospitality company currently operating solely within the UK. Our business currently comprises of 18 locations.

As a business, we are committed to act ethically, being honest and open in our business relationships and to implement effective systems and procedures to, as far as possible, ensure that slavery and human trafficking does not take place anywhere in the business or supply chain. This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

Supply chains

We tell the companies we do business with that we are not prepared to accept any form of exploitation and require them to provide a declaration to abide by our Modern Slavery Statement and confirm compliance with the Modern Slavery Act. We ensure we can account for each step of our supply processes—we know who is providing goods and services to us.

Recruitment

Using agencies

Our recruitment process follows firm policy and only uses agreed specified reputable recruitment agencies. To ensure the potential for slavery and human trafficking is reduced as far as possible, we will check recruitment agencies before adding them to our list of approved agencies. This includes: conducting background checks, investigating reputation, ensuring the staff, it provides have the appropriate paperwork (e.g. work visas), ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying. We keep agents on the list under regular review, at least every two years.

General recruitment

We always ensure all staff have a written contract of employment/engagement and that they have not had to pay any direct or indirect fees to obtain work. We always ensure staff are legally able to work in the UK. We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited). We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to. If, through our recruitment process, we suspect someone is being exploited, the Company will follow our reporting procedures (See Reporting slavery).

Identifying slavery

The following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.
- This list is not exhaustive. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

Reporting slavery

Talking to someone about your concerns may stop someone else from being exploited or abused. If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with the CEO, who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the CEO, before taking any further action.

Training & monitoring

We provide training to those staff members who are involved in managing recruitment and our supply chains.

More general awareness training is provided to all staff through formal training sessions online & via toolkits:

<https://www.salvationarmy.org.uk/toolkits/hta/>

We will review our Anti-slavery policy every two years. We will provide information and/or training on any changes we make.