

## **Mandik UK Modern Slavery and Trafficking Policy**

### **What is this policy for?**

Whilst we are not large enough to be caught by legislation (Modern Slavery Act 2015) that requires large companies to do various things to combat this issue, we are nevertheless committed to improving our practices and doing what we can to help those large businesses to combat slavery and human trafficking, particularly because we work with a global supply chain and wide range of customers. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **What is slavery and human trafficking?**

Most situations of slavery or human trafficking are covered by International Labour Organization's (ILO) definition of forced labour:

*"...all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."*

There is no clear legal definition of exploitation but United Nations and European Conventions say that exploitation includes forced labour, servitude and slavery.

One definition is: *"Taking unfair advantage of another person in a work situation, where the element of 'unfairness' is established against a benchmark established in law."*

This is a specific form of forced labour, in which the element of compulsion is through debt. It is characterised by a creditor-debtor relationship in which the worker is trapped by an unsustainably high debt to their employer.

Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion...to achieve the consent of a person having control over another person for the purpose of exploitation.

### **What steps do we take?**

We are transparent with our customers and will co-operate fully with them in any due diligence or audits they wish to undertake as regards our business and who we employ.

Where we are sourcing products and services from our suppliers we ask them about what steps they are taking in this regard and where we are able to influence contract terms we include relevant provisions in relation to this issue. We regard that reputable suppliers will not mind answering questions in this regard.

We encourage anyone who has any concerns that someone in the supply chain is not acting ethically to raise this concern and have an appropriate whistleblowing policy.

We provide training to our staff in this issue and how it can be hiding in plain sight including what things they might observe.



We review our practices from time to time to see where it can be improved.