



MODERN SLAVERY

Modern slavery is a crime violating human rights. Slavery, servitude, forced and compulsory labour and human trafficking, all have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

SP SQUARE CIC

- has zero-tolerance for modern slavery. We have transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- seeks the same high standards from all contractors, suppliers and other business partners, and as part of any contracting processes.
- includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

This policy applies to all persons working for or on behalf of SP SQUARE CIC in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

SP SQUARE CIC has

- overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all staff, contractors, and decisions comply with it.
- has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure efficacy in countering modern slavery.

SP SQUARE CIC staff and contractors

- are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chair of the Board.
- must ensure that this policy is read, understood and complied with. The prevention, detection and reporting of modern slavery in any part of SP SQUARE CIC business or supply chains is the responsibility of all those working for SP SQUARE CIC. Staff and contractors must notify SP SQUARE CIC board Chair immediately if it is believed that a conflict with this policy has occurred or may occur in the future.

Breaches of this policy will mean any employee will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Relationships with other individuals and organisations working on our behalf may be terminated if they breach this policy.