

	<b>Anti-Slavery Policy</b>	REF:	<b>ES029</b>		
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## 1. INTRODUCTION

1.1 Equate Design are committed to the highest standards of ethical conduct and integrity in our business activities. We acknowledge our responsibilities under the Modern Slavery Act 2015 and are committed to preventing slavery and human trafficking in our corporate activities and within our supply chains.

1.2 Equate Design considers that modern slavery encompasses:

- a) Human trafficking
- b) Forced work, through mental or physical threat
- c) Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- d) Being dehumanised, treated as a commodity, or being bought or sold as property
- e) Being physically constrained or to have restriction placed on freedom of movement

1.3 We understand that this requires an ongoing review of our internal practices in relation to employees, agents or consultants or any person or body acting on our behalf. This Policy Statement reflects our commitment to acting legally, 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 within our company or supply chain.

## 2. SCOPE OF THE POLICY

2.1 This policy applies to all employees, temporary workers, consultants, contractors, service providers, vendors, agents and subsidiaries acting for, or on behalf of Equate Design.

2.2 Every employee and associated person acting for, or on behalf of Equate Design is responsible for maintaining the highest standards of business conduct. Any breach of this statement is likely to constitute a serious disciplinary, contractual, or criminal matter for the individual concerned and may cause serious damage to our reputation and standing.

## 3. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

3.1 Equate Design takes steps to ensure that the risks of modern slavery are minimised as far as possible, considering our own business practices and those of any organisation that supplies goods and / or services. In the operation of our business, Equate Design's main supply chains are external specialist services, such as design support and specialist surveys to be undertaken for use and input to Equate Design's design commissions. Equate Design considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

## 4. COMMITMENTS

4.1 Equate Design has a zero-tolerance policy towards modern slavery. It will refrain from entering into business, and / or will discontinue any current business with any other organisation which knowingly supports, or is found to involve itself in slavery, servitude and forced or compulsory labour.

4.2 No external services provided to Equate Design is believed to be obtained by means of slavery or human trafficking. Equate Design strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## 5. RECRUITMENT

5.1 Our Employment and Induction Procedure and recruitment practices ensure compliance with The Modern Slavery Act 2015 and all other relevant employment legislation. Auditing practices are in place for checking that all employees have the right to work in the UK. We are continually reviewing our recruitment methods throughout the business to ensure transparency.

## 6. RELEVANT POLICIES

1. **ES021 Whistleblowing Policy** - We encourage all employees and others working on our behalf to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can raise these with our HR Manager.

2. **ES013 Equality & Diversity Policy** - Our policy makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. We also strive to ensure that our suppliers are aware of this policy when undertaking works with, or on behalf of Equate Design.

## 7. DUE DILIGENCE

7.1 Equate Design carries out due diligence processes in relation to ensuring slavery and / or human trafficking does not take place in its supply chains. This includes assessing areas of the business that may pose a risk, putting in controls to minimise these as far as possible. High risk suppliers are identified and audited to ensure ongoing compliance can be monitored more closely.

7.2 Equate Design has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and / or human trafficking.

7.3 In accordance with section 54(4) of the Modern Slavery Act 2015, Equate Design has contacted (or attempted to contact) all first tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and / or human trafficking is not taking place. Equate Design will seek to discontinue business with any supplier found by the enforcement authorities to be involved in modern slavery.

7.4 Equate Design encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

7.5 To ensure effectiveness in combatting modern slavery, Equate Design maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.

## 8. COMMUNICATION AND TRAINING

8.1 Upon commencement of employment, all employees undergo an induction process and are made aware of our policies relating to standards of behaviour that it required from them. We are committed to raising awareness of modern slavery issues including how to spot the signs in the business and supply chain.

8.2 Equate Design also provides training on awareness of modern slavery to departmental leads who have been identified as having responsibilities in this regard, namely those involved in HR, finance and procurement.

## 9. CONCERNS

9.1 All concerns regarding modern slavery should be addressed to line managers, HR or via the "See it, Sort it, Report it" system. Reporting can also occur in accordance with the Grievance or Whistleblowing Policy.

9.2 All staff involved in the procurement of goods and services must contact the Procurement Manager if they have any concerns about Slavery or Human Trafficking or if they are aware of or suspect a breach of The Modern Slavery Act 2015.

9.3 The identification of any breaches will be investigated by the relevant department following Equate Design's Incident Investigation procedure.

## **10. REVIEW**

10.1 This policy is endorsed by the Managing Director Equate Design. It will be reviewed annually as a minimum.

**Dan Wiscombe**  
**Managing Director**

**05/02/21**