

Modern Slavery & Human Trafficking Policy

Owner: HR Advisor - Directors

Effective date: 23/12/2025

Review: Annual

1. Statement

LLUK has zero tolerance for modern slavery, forced labour, bonded labour or human trafficking in any part of our operations or supply chain.

We are committed to acting ethically and with integrity in all business dealings and to implementing effective systems and controls to safeguard against any form of modern slavery.

2. Legal/Standards Framework

This policy is aligned with:

- UK Modern Slavery Act 2015
- ILO Core Conventions
- ETI Base Code
- Customer and certification body codes where applicable.

3. Scope

This policy applies to:

- All employees
- Agency workers
- Contractors
- Labour providers
- Suppliers and service providers

4. Risk Assessment & Due Diligence

LLUK will:

- Map Tier 1 suppliers and labour providers
- Identify higher-risk categories based on:
 - Country of origin
 - Commodity type
 - Labour-intensive processes.
- Use pre-qualification questionnaires
- Include modern slavery clauses in supplier contracts
- Conduct periodic audits or site visits where appropriate
- Implement corrective action plans where risks are identified.

5. Employment Practices

LLUK will ensure:

- Right-to-work checks for all employees
- No recruitment fees charged to workers
- Clear, written employment contracts
- Freedom for workers to leave employment with reasonable notice
- No retention of passports, ID documents, or personal belongings.

6. Supplier Expectations

All suppliers are expected to:

- Comply with the LLUK Supplier Code of Conduct
- Prohibit forced, bonded or trafficked labour
- Allow reasonable access for audits where required
- Cooperate with corrective action plans if issues are identified.

7. Training & Awareness

- All employees receive modern slavery awareness at induction.
- HR, procurement and management staff receive targeted annual training.
- Training records are maintained.

8. Reporting & Whistleblowing

Concerns may be raised through:

- Line Mangers
- HR
- Confidential grievance or whistleblowing channels.

Reports will be:

- Treated confidentially
- Investigated promptly
- Escalated where necessary

9. Investigation & Remediation

Where modern slavery risks or incident are identified:

- Immediate steps will be taken to protect affected individuals.
- A victim-centred remediation plan will be implemented.
- Where appropriate, LLUK will collaborate with:

- Authorities
- NGOs
- Certification bodies
- Corrective actions will be documented and monitored.

10. KPIs & Monitoring

LLUK will track:

- Percentage of suppliers risk-screened
- Number of staff trained annually
- Number of issues raised and resolved
- Corrective actions completed on time

11. Governance

- Policy reviewed annually by Directors.
- Modern Slavery Statement published where legally required.
- Board oversight of risks and actions.

12. Records & Retention

All records relating to:

- Supplier assessments
- Training
- Investigations
- Corrective actions

Will be retained for a minimum of 5 years.

13. Contact

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