

## Modern Slavery Policy

### Enginuity Group

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Policy Name	
<b>Applies to:</b>	All Employees of Enginuity Group
<b>Date of issue:</b>	September 2023
<b>Review Date:</b>	September 2026
<b>Owned by:</b>	Head of People
<b>Authorised by:</b>	ELT
<b>Location:</b>	MyHR

### Change History

Changes to specific sections of this document from the previous version are listed below

Version No.	Section Reference	Summary of Changes	Author	Date
1	All	Initial Issue	Helen Fowweather	August 2023

## Policy Statement

Enginuity is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

This policy sets out the steps the Enginuity Group has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

## Contents:

1. **Scope of policy**
2. **Legal Requirements**
3. **The policy**
4. **Review of policy**
5. **Cross reference with other documents**

### 1. **Scope of Policy**

This policy applies to all people working for us or on our behalf, in any capacity, including employees at all levels, agency workers, interns, contractors and external consultants.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our employees. We have a zero-tolerance approach to any form of modern slavery and want our employees to feel confident that they can expose wrongdoing without any risk to themselves.

### 2. **Legal Requirements**

Although Enginuity Group is below the threshold for a legal requirement to publish a statement in line with section 54(1) of the Modern Slavery Act 2015, it sets out a policy here in line with the Act.

### 3. **The Policy Details**

#### 3.1 **Recruitment**

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

#### 3.2 **Supply chain**

We do not enter into business with any organisation, in the UK or overseas, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

All new suppliers will be required to supply a copy of their Modern Slavery Policy or Statement. If they do not have one, then they will be asked to confirm agreement to the statement set out in Appendix 1.

### **3.3 Employee Awareness**

We will ensure all employees have an awareness of the Modern Slavery Act 2015 and inform them of appropriate action to take if they suspect a case of human trafficking.

We ensure employees involved in procurement activity are aware of the requirements to assess new suppliers and their commitment to the Modern Slavery Act 2015.

### **4. Review of policy**

This policy will be reviewed every three years or when legislation requires.

### **5. Cross Reference with other documents**

- Whistleblowing Policy
- Safeguarding Policy
- Code of Conduct
- Recruitment Policy

## **APPENDIX ONE**

We hereby commit to not engage in any form of modern slavery in our business or supply chains. This includes but is not limited to, forced labour, debt bondage, human trafficking, and child labour.

We confirm that our recruitment processes ensure that all prospective employees are legally entitled to work in the UK, and we have policies in place to safeguard employees from any abuse or coercion.