



skewb

Modern (anti) Slavery Policy

This policy details the key guidelines and procedures our employees are expected to follow in the event they suspect modern slavery is taking place.

January 2021
Version 2.0



Skewb has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

So, what do you need to know?

This Policy explains what modern slavery is, provides guidance to colleagues, ensuring they can (a) recognise modern slavery and (b) understand the correct reporting requirements and procedure.

Skewb are committed to ensuring there is 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.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf 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.

This policy does not form part of any employee's contract of employment and we may amend it at any time

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights.

The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015.

These are:

- 'slavery' is where ownership is exercised over a person
- 'servitude' involves the obligation to provide services imposed by coercion
- 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
- 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

Type	Explanation
Slavery	The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.
Servitude	An obligation to provide one's services that is imposed by the use of coercion, and is to be linked with the concept of 'slavery' described above.
Forced Labour	All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.



Human Trafficking	<ul style="list-style-type: none">• Recruitment, transportation, transfer, harbouring or receipt of persons.• By means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person; (where a child is involved, the above means are irrelevant).• For the purposes of exploitation, which includes (but is not exhaustive):<ul style="list-style-type: none">○ Prostitution○ Other sexual exploitation○ Forced labour○ Slavery (or similar)○ Servitude etc.
-------------------	---

Responsibilities

Company

Skewb's CXO team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Operating Officer 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 they are effective in countering modern slavery.

Management

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees

Employees must ensure that they have read, understood and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. We request that our employees, contractors, suppliers and other business partners, avoid any activity that might lead to, or suggest, a breach of this policy.

Reporting Procedure

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or Chief Operating Officer OR report it in accordance with our Whistleblowing Policy as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

You should note that where appropriate, and with the welfare and safety of our employees as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Chief Operating Officer.



We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the intranet.

Communication & Awareness of this Policy

We will provide our employees with training on Modern Slavery to help them understand their duties and responsibilities under this Policy.

Our zero-tolerance approach to Modern Slavery will also be communicated to all associated parties at the outset of the business relationship with them and a copy of this policy provided to them.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Policy Updates

We will review this policy annually and update you should any changes be made.

Date	Reason	Created by	Verified by	Version No
September 2020	New Policy Creation	Claire Crew	Shashi Seshadri	1.0
January 2021	Annual Policy Review. Addition of Policy updates table.	Claire Crew	Claire Crew	2.0

If you have any concerns relating to this policy, please contact claire.crew@skewb.uk