

Modern Slavery Policy

Overview

In accordance with the Modern Slavery Act 2015, Welcome Skills is committed to work environment that is free from human trafficking, forced labour and unlawful child labour (collectively 'human trafficking and slavery'). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Welcome Skills is satisfied from its own due diligence there is no evidence of any act of modern day slavery or human trafficking within its own organisation.

Welcome Skills has appointed a senior compliance officer (its Anti-Slavery and Human Tracking officer) and will take steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and /or business partners (collectively by its 'Suppliers').

Welcome Skills will not knowingly support or deal with any businesses involved in slavery or human trafficking.

Definition

Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the 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 for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Requirement form Suppliers

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable law concerning the maximum hours of daily labour;
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and

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Modern Slavery Policy	June 2021	1	K.Hussin	May 2022



- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to Welcome Skills, also adhere to these requirements.

Any breach of this Policy (including by a supplier) can be reported in (in confidence, if required) by contacting Welcome Skills' senior compliance officer

Welcome Skills takes any breach of this policy extremely seriously.

Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with Welcome Skills terminated immediately, without compensation.

If a Supplier to Welcome Skills is found in violation of this policy, Welcome Skills will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

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