

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

## Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Booted and Rooted Ltd, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2019.

## Our business and supply chains

- Booted and Rooted Ltd
- Accredited and Non Accredited Education, Employability Training and Creative Education Activities, Criminal Justice
- We operate in the Greater London Area.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

## Risk assessment

In the past year, we conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.



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## Policies

Booted and Rooted operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business.
- We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

## Supplier due diligence

Booted and Rooted conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment



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## Awareness

Booted and Rooted Ltd has raised awareness of modern slavery issues by putting up posters across our facilities that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## Training

In addition to the awareness programme, Booted and Rooted Ltd has rolled out a fresh e-learning course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Booted and Rooted Ltd will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Booted and Rooted Ltd anti-slavery policy

## Measuring how we're performing

Booted and Rooted Ltd has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

This statement covers 27 May 2019 to 31 May 26 2020 and has been approved by the board of Booted and Rooted Ltd at the board meeting on June 27<sup>th</sup> 2019.

Michael Bent Director

June 27<sup>th</sup> 2019



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