

Modern Slavery

Policy Document

1. Introduction

Lakethorne Group Services acknowledge its responsibilities in relation to ethical business activity and in tackling modern slavery within our supply chain or in any other part of our business. Our policies and our interaction with colleagues, as well as suppliers, reflects our commitment to acting ethically in all our operational matters. We strive to ensure that we, and our supply chain, act in compliance with Section 54(1) of the Modern Slavery Act 2015 and will continue to monitor such compliance.

2. Scope

Slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking, and related forms of workplace abuse. In this policy, we use the terms "slavery and human trafficking" to include all forms of slavery, servitude and forced or compulsory labour and human trafficking. Lakethorne is committed to maintaining and improving systems and processes to help ensure that there are no human rights violations related to our own operations or our supply chains.

3. Aims and Objectives

Lakethorne is committed to maintaining and improving systems and processes to help ensure that there are no human rights violations related to our own operations or our supply chains. In particular we regularly:

- critically examine existing supply chains end-to-end to identify potential risk areas of human trafficking and slavery (e.g. "hot" countries or industries).
- identify and address any other potential risk areas within the business, with a focus on sub-contractors or any unregulated workforce.
- review internal policies and procedures for procuring new suppliers or commencing any new business.
- review existing supplier and contractor contracts to ensure they are in line with relevant internal policies and procedures.
- review internal training and HR procedures in respect of modern slavery to ensure that all staff have had appropriate training and are aware of company policies and that there is an effective whistleblowing policy if modern slavery is found.
- review our procedures to ensure that risks are appropriately mitigated, credible information is examined and informed decisions are made.

Lakethorne will promptly and thoroughly investigate any claims or indications that a supplier is engaging in human trafficking or slave labour, or is otherwise not complying with this Policy. Any such claim should be reported to appropriate Lakethorne personnel or others as appropriate, along with the resolution of the claim and/or the findings of the investigation.

Lakethorne does not require certification direct from suppliers that materials incorporated into the product comply with laws regarding slavery or human trafficking of the country in which they are doing business.

Lakethorne maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking.

Lakethorne will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour.

4. Policy Review

The Managing Director undertakes to periodically review this policy in light of current and planned future activities, on an annual basis, and more frequently when legislation or industry best practice dictates.

Signed: 

Richard Bent
Managing Director

Date: January 2019

Next review date: January 2020

| Doc Ref & Version | Owner | Date implemented |
|-------------------|--------------|------------------|
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