

Anti-Slavery & Human Trafficking Policy

This policy deals with the specific issues associated with Modern Slavery and Human Trafficking. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Holmes Wood has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity within all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the practice.

Holmes Wood is committed to ensuring a transparent approach is taken to tackling modern slavery through the 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 we expect our suppliers to hold their own suppliers to the same high standards.

This policy applies to all Holmes Wood employees, agents, contractors and other third parties acting on the company's behalf.

This policy does not form any part of any employee contract of employment and can be amended at any time.

Responsibility

At Board level for The Holmes Wood Consultancy Limited, Thomas Cartledge shall be responsible for overseeing and implementing the Policy. Thomas shall sign and publish the company's annual Modern Slavery Statement.

Responsibility for putting in place appropriate systems to monitor, train and combat Modern Slavery lies with Dawn Bingham – Global HR Director.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is everyone's responsibility. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager, local HR team or follow the Whistleblowing Policy as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may in the future.

You are expected to report as soon as possible whether you know or suspect any instance of modern slavery is occurring within any part of the practice or supply chain.

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

Holmes Wood aims 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. Holmes Wood 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 the Practice or supply chain.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected to raising a concern.

Communication and Awareness

Information on this policy and further information regarding the Modern Slavery Act 2015 can be found on Cito. Training will be provided as necessary.

Holmes Wood's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate on an ongoing basis.

This policy has been approved by Thomas Cartledge (CEO) who will review and update it annually.