



Modern Slavery Policy

Date Created	Created By	Review Date
June 2018	Liz Moran	February 2021

Exec Sign Off (if applicable)	Name: Alison Hughes, HR Manager	Signature: 	Date: February 2020
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This policy applies to all persons working for System Group in whatever capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Definitions

System Group considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitments

System Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

System Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to System Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. System Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

System Group expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- zero-tolerance approach to modern slavery in our organisation and our supply chains.
- prevention, detection and reporting of modern slavery in any part of our organisation or supply chain which is the responsibility of all those working for System Group or on our behalf. Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- demonstrate commitment to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- take a risk-based approach to our contracting processes and keep under review.
- assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.

- using a risk based approach, we will assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Supply Chain

System Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We will continue to implement systems and controls aimed at ensuring that modern slavery is not taking place within our organisation or in the supply chain. We expect that suppliers to require their suppliers to the same high standards.

Anti-Slavery Compliance Officer

System Group's Safeguarding Officer is responsible and accountable to the board in ensuring this policy and culture is promoted and enforced throughout System Group and will then undertake relevant action to ensure the Company's meets its obligations.