

Slavery and Human Trafficking Statement Policy

**Starfish 9 Ltd. Slavery & Human Trafficking Policy
2021-Issue 2**

(Last Review Jan 2021 - Next Planned Review Jan 2022)

Slavery and Human Trafficking Statement

What this policy covers

This policy applies to employees, workers and contractors.

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Our Commitment

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

Due diligence processes for slavery and human trafficking

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

There is a Company induction where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.

Your responsibilities

The prevention, detection and reporting of modern slavery in any part of Starfish 9 Ltd business or supply chains, whether in the UK or abroad, is the responsibility of all those working for Starfish 9 Ltd or under the Starfish 9 Ltd's control. You are required to avoid any activity that might lead to a breach of this policy.

Breach of this policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Starfish 9 Ltd may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Reporting suspicions of slavery

You can report any suspicions of slavery either through the Company's Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://www.modernslaveryhelpline.org/>

08000 121 700.

Responsibility for this policy

The Managing Director has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The SHEQ Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Name: John Jessimer

Signed: 

Position: Managing Director

Date: 7 January 2021

