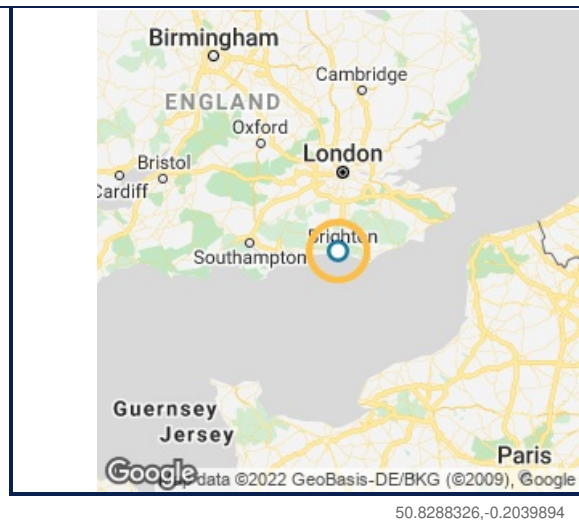


Modern Slavery Assessment

D-U-N-S® number	640817458
Organisation name	TRUSTCO PLC.
Location	TRUSTCO PLC.
Address	366 Kingsway, HOVE, BN34QT
Country	
Purpose	Administration
Exported by	Craig Fairs (frameworks@trustco.co.uk)
Exported date	07-01-22



Contents

Contents	2
Scoring	3
Recommendations	4
Introduction	5
About this Assessment	6
1. Information About the Business and its Supply Chain	7
2. Policies Relating to Modern Slavery	9
3. Assessing and Managing Risk	12
4. Due Diligence Processes	14
5. Training Provision	17
6. Key Performance Indicators	19

Scoring

Overview

Based on the responses given, performance ratings have been generated to quantify a measure of performance in each of sections of the assessment as well as an overall Total Score.

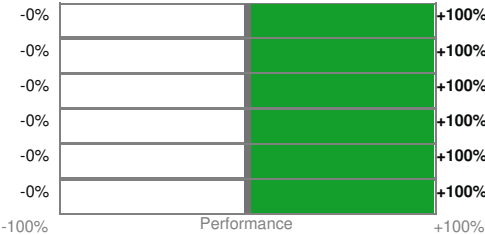
This rating can be used to identify areas of strengths and weaknesses and as a benchmark for assessment-to-assessment growth. Ratings have been coupled with a balanced Red-Amber-Yellow-Green scorecard to provide a visual standard for comparison.

Total Score



Total Score

Score per theme



Governance	Green
Policies and Procedures	Green
Risk Assessment and Management	Green
Due Diligence	Green
Training	Green
KPI	Green

Recommendations

Overview

A number of suggested improvements have been made, based on a analysis of your responses to the Modern Slavery Assessment. By implementing these suggested improvements, your organisation can improve its modern slavery statement and should be in a stronger position to mitigate modern slavery risks.

Improvements

3 questions

57. Your organisation should put measures in place to identify at risk areas within their supply chain. (17/17a)

It is important for organisations to have a good understanding of the type of work in their supply chains and which workers may be more vulnerable to exploitation, so they are able to prioritise actions on areas at high risk.

For more detailed guidance on assessing high areas of risk, see [ETI's Human Rights Due Diligence Framework](#).

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.
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58. Your organisation should reconsider how it investigates its suppliers' modern slavery risks. (18)

If an organisation has properly assessed the nature and extent of its exposure to the risk of modern slavery, it is highly unlikely that it will not identify any suppliers to be at higher risks.

Organisations may undertake desk-based research as a first step to understand where the highest risks may be and to help them when engaging suppliers that may be at higher risk.

Organisations should consider using resources like the [Responsible Sourcing Tool](#) to help with their research.

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.
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64. Your organisation should have processes in place for responding to a report of suspected instances of modern slavery that follows good practice. (23/23a/23b/23c)

It is important to have a prompt and victim centred response to reports of modern slavery, so that victims are safeguarded and are supported in receiving justice and compensation.

Where an organisation's suppliers have alerted their customers of modern slavery, is cooperating with authorities, actively implementing corrective actions and is not found to be complicit, organisations should have no standard policy to immediately delist or suspend trade with that supplier because of that specific incident.

A Service Level Agreement (SLA) is a formally recognised agreement to react within a specific time frame and with a specific response. An SLA may be made explicit in an organisation's modern slavery policy.

For guidance on how your organisation and your suppliers can ensure they are well prepared, see [CIPS' Making a Plan for Remediation](#) or [Shift's Guidance on Remediation](#).

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.
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Introduction

Section 54 (Transparency in Supply Chains etc.) of the Modern Slavery Act 2015 requires applicable commercial organisations to publish a 'modern slavery statement' for each financial year of their organisation, otherwise known as a TISC statement. It applies to all commercial organisations which carry on a business, or part of a business, in the UK, supply goods or services and have an annual turnover of £36m or more.

The Government encourages organisations, including those that do not fall in scope of the Act, to complete this assessment so that organisations have a framework to aid them in their journey to understanding and addressing modern slavery risks. If you have been invited to complete the assessment by the Government or any other public body, this tool should help them work in partnership with your organisation to improve how your organisation ensures workers aren't being exploited in your supply chains.

What is modern slavery?

Modern slavery is an umbrella term used to encapsulate offences in the Modern Slavery Act 2015: involving slavery, servitude and forced or compulsory labour; and human trafficking.

Why is it important?

Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involve people being coerced and forced into providing service to others. Some estimates suggest that there were over 40 million people living in slavery across the world in 2016, many of whom will be working to produce the goods and services which we buy and sell every day. The Home Office estimated that there were 10,000-13,000 potential victims in the UK alone in 2013. It is a crime that affects men, women and children.

The Home Office estimates the total social and economic cost of modern slavery to the UK was £3.4-4.3 billion in 2016-17, making the average cost of modern slavery crime (£334,750) higher than the unit cost of any other crime type apart from homicide. Worldwide, the International Labour Organisation (ILO) estimates over \$150 billion of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut good British businesses and if we are to eradicate this horrendous crime from the UK and the rest of the world, government and businesses must work together.

About this Assessment

This assessment provides information about activity undertaken by TRUSTCO PLC. to tackle modern slavery. It may be used to support the production of an annual modern slavery statement as set out in the UK Modern Slavery Act 2015.

Your responses can be updated at any time to maintain a current and accurate report. The Assessment has six sections, each of which captures information that may be included in a statement, as set out by guidance within the Modern Slavery Act 2015.

The answers you have provided will be kept confidential and will only be shared with buyers that you have given permission to access.

Company and point of contact:

All information contained within this assessment has been submitted by a user or users acting on behalf of TRUSTCO PLC..

TRUSTCO PLC. represents and warrants that the information provided within this declaration will be as accurate and complete as possible and shall accurately represent its capabilities.

The main point of contact for this assessment is:

Craig Fairs
Operations Director
frameworks@trustco.co.uk
03448801999

According to the information submitted in support of this assessment:

TRUSTCO PLC. has stated that its turnover is 4.6 GBP.

TRUSTCO PLC. has indicated that it is completing this assessment on behalf of its own organisation,

TRUSTCO PLC. has provided the following additional information regarding their commitment to tackling modern slavery: This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers. Trustco Plc strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

The Government encourages organisations not in scope to still consider publishing a statement as modern slavery risks can manifest in almost any organisation.

1. Information About the Business and its Supply Chain

About this section:

This section provides some basic information about your organisation and its business operations which will help to provide context for a modern slavery statement. Ensuring relevant and up-to-date information in statements will help your organisation communicate its efforts in the most effective manner.

For the purpose of drafting a Modern Slavery Statement, information to disclose could include:

- the sector(s) the business operates in and whether any of its work is undertaken by agency labour
- the organisational structure and group relationships
- the countries it sources its goods or services from, including high risk countries where modern forms of slavery are prevalent.
- the make-up and complexity of the supply chains
- the businesses operating model
- relationships with suppliers and others, including trade unions and other bodies representing workers

Having a good understanding of your supply chain helps to define the boundaries of the report and to support the identification of risk regarding modern slavery.

1a. Please enter your organisation details.

- Full name of your company
TRUSTCO PLC.
- DUNS number
640817458
- Street
366 Kingsway
- Town or City
HOVE
- Postcode
BN3 4QT
- Country
United Kingdom - GBR
- Date of registration in country of origin
01/01/1997
- Registered company number
03476994
- Registered VAT number
704558241
- Registered website address
trustco.co.uk

1b. Do you want to complete this Modern Slavery Assessment for your organisation as a whole or for a specific contract?

- Organisation as a whole
For a specific contract

1c. Please select the relevant sector(s) that your organisation operates in.

- Information and communication

1d. Are you a Small, Medium or Micro Enterprise (SME)?

- Yes
No

2. Which of the following members of your group structure are you completing this assessment on behalf of?

- My own organisation
Immediate parent
Domestic parent
Global parent

3. Who is your organisation's main point of contact for this assessment?

- First name
Craig
- Last name
Fairs
- Job title
Operations Director
- Email
frameworks@trustco.co.uk
- Telephone
03448801999

4. Please enter the turnover that is listed within your most recent set of annual accounts.

- Turnover in GBP
4.6
- Provide the end date of these latest accounts
31/03/2020

2. Policies Relating to Modern Slavery

About this section:

The establishment of effective policies and incentives shape the environment and sets the tone of an organisation in assessing, preventing and mitigating the risk of modern slavery. Clear organisational policies demonstrate an organisation's commitment to this issue and ensures that appropriate and coordinated action is taken throughout the business.

Tackling modern slavery does not necessarily require a stand-alone policy. It could simply be adapting, and/or clarifying how existing policies and practices, programmes and management systems already work to prevent modern slavery.

If policies and practices are to have the desired effect they must be supported through effective communications and, where appropriate, training, resourcing and collaboration of effort by appropriately skilled personnel. Policies should be established and clearly communicated so that anti-slavery activity within a company and its supply chains becomes embedded as standard practice, which staff are aware of and incentivised to partner on and support.

Policies work best when supported by senior management and are updated and reviewed regularly.

5. Under Section 54 of the Modern Slavery Act 2015, is your organisation required to produce a Modern Slavery Statement?

- Yes
- Yes but not produced a statement covering 2017-2018
- Not required but have produced a statement**
- Please upload the statement**
Anti slavery and human trafficking policy V2 21 01 2020.pdf
- Not required and no statement has been produced

6. Does your organisation's Modern Slavery Statement meet the following legal requirements? Tick all that apply

- Approved by the board of directors (or equivalent management body)**
- Signed by a director (or equivalent)**
- Accessible via a prominent place on your website's homepage**
- None of the above

7. Does your latest statement include information on the following areas? Tick all that apply

- Information about your organisation and supply chains**
- Policies relating to modern slavery**
- The parts of your business and supply chains where risks of modern s..**
- Due diligence processes in place to manage and prevent risks of mod...**
- Training and capacity building of staff around modern slavery**
- Key performance indicators your business uses to measure progress...**
- None of the above

8. Was your latest statement produced within 6 months after your last financial year end, as per Government guidance?

- Yes**
- No

9. Have any incidences of modern slavery been recorded or uncovered within your organisation or supply chains in the past 12 months?

- Yes
- No**

10. Has your organisation taken steps to map your supply chains to support how your organisation identifies modern slavery risks?

- Yes**
- No

10a. How many tiers?

- Tier 1**
- Tier 2**
- Tier 3
- Tier 4
- Tier 5

10b. Which locations do you believe are at higher risk of modern slavery in your operations and supply chains?

- No locations are considered to be at higher risk of modern slavery**

11. Does your organisation have policies that are relevant to the prevention of modern slavery?

- Yes and they are publicly available
- Please upload relevant policies
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- Yes but some/all are not publicly available
- No

12. Do your organisation's modern slavery policies or codes include any of the following provisions? Tick all that apply.

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers original identification documents
- Provides access to remedy, compensation and justice for victims of m..
- None of the above

13. Does your organisation meet any of the following good practice in relation to its modern slavery policies? Tick all that apply.

- Policies are approved by senior management
- Policies are available to workers in your organisation and communicat..
- Policies are available to workers in your supply chain and communica...
- Relevant staff in your organisation are trained on these policies
- High risk suppliers are required to adhere to your modern slavery poli...
- High risk suppliers are trained on the relevant policies
- None of the above

3. Assessing and Managing Risk

About this section:

Modern slavery risk assessments should be seen as part of an organisation's wider approach to risk management and could form part of more general risk assessments that are carried out for a variety of reasons.

Appropriate resources are needed to ensure that risk assessment strategies can be effective. This means that the assessments should be able to identify the risks and issues, properly assess their level of importance, and ensure that appropriate remedies are in place.

Identifying relevant information from internal and external sources will help businesses to undertake effective risk assessments and appropriate review of those risks. Particular business risks to consider in assessing and managing risks to workers include:

- Country risks:
 - Exposure may be greater in global supply chains in countries where protection against breaches of human rights are limited, particularly with regard to rights of foreign contract workers to retain their own ID and papers, and/or where work arrangement by agents is common, etc.
- Sector risks:
 - There are different risks and levels of risk in different sectors. For example, the risks and arrangements which generate bonded labour situations for workers in the extractives sector may differ to those causes in manufacturing.
- Transaction risks:
 - Banks or financial institutions may be involved in facilitating financing from or supporting cases of modern slavery and bonded labour in operations or supply chains or through money laundering.
- Business Partnership risks:
 - Different supplier relationships and business partnerships will all carry different levels of risks. In some cases, existing long-term partnerships will involve less risk because the organisation will have a better knowledge of their partner's operations and policies. However, a new partnership or business relationship may be equally low risk as long as proper due diligence is conducted.

14. Have you assessed how your organisation's purchasing practices may create pressures on your suppliers that could lead to modern slavery?

- Yes
- No

14a. What aspects have you assessed? Tick all that apply.

- Aggressive pricing that does not consider sustainable production cost.
- Short lead times
- Late high-volume orders
- Inaccurate forecasting
- Late or extended payments
- Withdrawn from contracts last minute
- Unfair penalties for not meeting orders despite last minute changes
- Inaccurate technical specifications
- Other

15. At which of the following stages during the procurement process does your organisation consider modern slavery risks? Tick all that apply.

- Needs identification
- Requirement definition
- Tender evaluation (including scoring and adjudication process)
- Contract award
- In-life contract management
- End of contract review
- Please provide any further details on the answer options that ...
- All aspects of the contract are reviewed including the likely hood of workers being exploited
- None of the above

16. Do you supply goods (to the buyer/s that invited you to complete this assessment) that have been identified by the US Department of Labor to be at higher risk of being produced by child labour or forced labour?

- Yes
- No
- Do not know
- Not applicable

17. Where have you identified there to be the highest risk of modern slavery in your organisation and your supply chains?

- Categories
- Vulnerable groups
- Types of work
- Sectors
- Other
- Have not identified

17a. Has your organisation identified any categories that are considered as high risk? Tick all that apply.

- Goods for resale
- Goods not for resale
- Services for sale
- Services used for operational purposes
- No areas of risk have been identified
- Do not know

18. Within the last 12 months, have you identified any of your organisation's suppliers as being at high risk of modern slavery as a result of your organisation's risk assessment?

- Yes
- No - we have investigated our supplier risk and found none to be at hig.
- No - we have not investigated our suppliers' modern slavery risks

4. Due Diligence Processes

About this section:

Human rights due diligence is a key concept in the UN Guiding Principles on Business and Human Rights (UNGPs). The UNGPs specify that due diligence processes should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

Due diligence procedures should be:

- proportionate to the identified modern slavery risk,
- the severity of the risk, and
- level of influence a business may have.
- informed by any broader risk assessments that have been conducted (see Assessing and Managing Risk section above).

For the purpose of the Modern Slavery Statement, due diligence information could include:

- Actions taken to understand the businesses operating context
- Impact assessments undertaken
- Action plans to address and risk/actual instances of modern slavery and how actions have been prioritised
- Evidence of stakeholder engagement
- Business-level grievance mechanisms in place to address modern slavery
- Actions taken to embed respect for human rights and zero tolerance of modern slavery throughout the organisation

Due Diligence

19 questions

19. Does your organisation undertake any activity to support workers in your supply chains have access to trades unions or other forms of worker representation?

- Yes
- Please provide further detail
The practical guide is made available to all workers as are the details of relevant trade unions
No
Do not know

20. Does your organisation actively work with non-governmental organisations (NGOs) or other businesses to support its efforts to prevent and mitigate modern slavery?

- Yes - NGOs
- Yes - Businesses
- Please provide further information on how you collaborate wit..
We work with consultants and organisations to ensure that our MS policy's are correct and adhered to. this is both internally and within our supply chain.
No

21. Has your organisation undertaken any due diligence to ensure that workers in your supply chains are not trapped in debt bondage as a result of how they were recruited?

- Integrated safeguards in to company policies
- Raised awareness and built capacity of staff to understand risks of de...
- Screen and evaluate key recruitment agencies/labour providers
- Monitor key recruitment agencies/labour provider for ethical recruitme..
- Undertaken corrective action plan
- Developed action plan to make system improvements
- Participated in multi-stakeholder initiatives to make a wider impact
- Other action
None of the above

22. Does your organisation take any measures to ensure workers in your organisation have access to a grievance mechanism to report incidents or suspected incidences of modern slavery?

- Yes
No
Do not know

22a. In which supply chain tiers does your organisation ensure that workers know their rights of employment?

- Tier 1
- Tier 2
- Tier 3
- Tier 4
- Not applicable

22b. In which supply chain tiers does your organisation ensure that all workers have access to an anonymous grievance mechanism to report incidents or suspected incidences of modern slavery without any form of penalty?

- Tier 1
- Tier 2
- Tier 3
- Tier 4
- Not applicable

22c. In which supply chain tiers does your organisation ensure that measures are in place to ensure migrant workers can report grievances and receive feedback in a language they understand?

- Tier 1
- Tier 2
- Tier 3
- Tier 4
- Not applicable

22d. In which supply chain tiers does your organisation ensure that multiple communication channels are available to workers to report their concerns e.g. to a trade union representative?

- Tier 1
- Tier 2
- Tier 3
- Tier 4
- Not applicable

22e. In which supply chain tiers does your organisation ensure that the effectiveness of this mechanism has been assessed with senior leadership engagement?

- Tier 1
- Tier 2
- Tier 3
- Tier 4
- Not applicable

23. Do you have a Service Level Agreement (SLA) or any other process in place for responding to a report of suspected instances of modern slavery?

- Yes
- No

23a. Does your organisation automatically de-list or terminate trade with a supplier even if they are found to not be complicit?

- Yes
- No

23b. Are your suppliers expected to follow a similar process?

- Yes
- No

23c. Are suppliers required to provide an action plan highlighting gaps in their process, root causes of incident and corrective action they are undertaking?

- Yes
- No

24. Has your organisation undergone a social audit (or another form of audit which assesses labour conditions) within the last 12 months? Tick all that apply.

- Yes, an internal social audit
- Please upload
Anti slavery and human trafficking policy V2 21 01 2020.pdf
- Yes, an external social audit
- Please upload
Anti slavery and human trafficking policy V2 21 01 2020.pdf
- No audits carried out
- Please provide any further information
Internal audits are carried out as are external audits using the Crown Commercial Services assessment tool

25. Does your organisation conduct any types of audits on its suppliers and their business activities or have any other process to investigate working conditions in your supply chain?

- Yes
- Please provide further detail
Copies of suppliers MSA are inspected
No

25a. Has your organisation identified labour rights issues in your supply chain as a result of these audits?

- Yes
- No

25b. How does your organisation conduct these audits?

- By organisation's own staff
- By a third party
- Announced audits
- Unannounced audits
- Other

25c. How often do you audit these suppliers?

- Pre-contract
- Annually
- Every two years
- Every three years or more

26. Is there any further information you want to provide on the due diligence your organisation undertakes to manage modern slavery risks?

- Please provide details
Regular meeting with government officials to ensure we are doing everything we can to manage modern slavery risks

5. Training Provision

About this section:

Training is a fundamental way of raising awareness and ensuring that people understand the importance of a particular issue. It also helps people to understand what they need to do, and how to work together internally or externally if they encounter something that raises concerns.

Training may be targeted at different groups of employees within a business, including leadership, or at different businesses within a supply chain, and the training itself could take a range of different forms. It may range from detailed training courses to broader awareness-raising programmes.

Organisations should think about where training should be targeted to have the most effect. If those employees who might encounter victims directly are more aware of the indicators of modern slavery and of how to report suspected cases, and what actions they can expect the company to take, then they can raise flags, and help to root it out in a particular business or supply chain.

27. Does your organisation provide training to workers on modern slavery?

- Yes
- No

27a. Does the training cover the ILO's Forced Labour Indicators?

- Yes
- No

27b. What outcomes are expected? Tick all that apply across the different training your organisation provides.

- Recipients understand indicators of modern slavery
- Recipients understand how to report suspicions of modern slavery
- Recipients understand the Modern Slavery Statement requirements
- Recipients understand how to consider modern slavery risks in procu...
- Recipients become better equipped to undertake modern slavery due ...
- Other

27c. What format is the training? Tick all that apply.

- E-Learning
- Workshops
- Webinars
- Courses
- Other

27d. Is this training mandatory for those who receive it?

- Yes
- No

27e. How frequently is training on modern slavery provided? Tick all that apply.

- At induction
- When a violation occurs
- When a policy is updated
- Every 6 months
- Every 12 months
- Other

27f. Who developed the training on modern slavery?

- In-house staff
- Third party
- Other

27g. Who delivers training on modern slavery?

- In-house staff
- Third party
- Other

27h. Is any of the training above provided to suppliers by your organisation?

- Yes
- No
- Please provide further details on the type of training.
We work with our supply chain to ensure that they adhere to our MS policy and provide training where necessary

6. Key Performance Indicators

About this section:

This section examines your organisation's Key Performance Indicators, the areas they cover and their governance.

Key Performance Indicators (KPI): quantifiable value or metric to measure the activity and progress towards the achievement of intended results or objectives.

Performance indicators are important in driving the performance of a business and shaping the way it operates. They can also affect how exposed the business is to the risk of modern slavery.

KPIs could be used in a modern slavery statement in two ways. Firstly, businesses could choose to provide information on their existing KPIs and set out whether they have considered whether they make their business and supply chain vulnerable to modern slavery.

Secondly, this section of the statement could outline any additional KPIs which the company has introduced to measure the performance of any anti-slavery actions undertaken. If an initial risk assessment highlighted issues in a company's operations or supply chain, a KPI could be introduced to measure progress against reducing that risk, i.e. improving conditions for those people.

A business could set targets for:

- Training and capacity building of staff about modern slavery issues
- Measuring changes in awareness of risk
- Appropriate decision making and swift action as appropriate
- Grievance procedures and whistle-blowing procedures for workers if cases or suspected cases are found
- Visibility, leverage and oversight of suppliers in relevant goods and services supply chains

It is also good practice for KPIs to be reviewed regularly by senior management to ensure the KPIs are practical and achievable.

For further guidance on developing KPIs, see the [Government's practical guidance](#).

28. Does your organisation have any key performance indicators (KPIs) relating to how your organisation mitigates modern slavery in your organisation and supply chains?

- Yes
- No

28a. In which areas does your organisation set KPI's?

- **Policies**
- **Provide details on the KPI's that are set within your organisation..**
We have a zero-tolerance approach to modern slavery in our organisation and our supply chains 100% of our supply chain have agreed to adhere to the Modern Slavery act 2015 All new and existing worker and contractors complete MS training in accordance with our schedule Any breaches are reported/recorded and resolved immediately We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- **Risk assessments**
- **Provide details on the KPI's that are set within your organisation..**
We take a risk based approach to our contracting processes and keep them under review. We 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 our risk based approach, we will also 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. • Consistent with our risk based approach we may require: • Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct • Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code • As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct. • If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships
- **Due diligence**
- **Provide details on the KPI's that are set within your organisation..**
Integrated safeguards in to company policies Raised awareness and built capacity of staff to understand risks of debt bondage Screen and evaluate key recruitment agencies/labour providers Monitor key recruitment agencies/labour provider for ethical recruitment and hiring Undertaken corrective action plan Developed action plan to make system improvements Participated in multi-stakeholder initiatives to make a wider impact
- **Training**
- **Provide details on the KPI's that are set within your organisation..**
All new and existing worker and contractors complete MS training in accordance with our schedule Recipients understand indicators of modern slavery Recipients understand how to report suspicions of modern slavery Recipients understand the Modern Slavery Statement requirements Recipients understand how to consider modern slavery risks in procurement Recipients become better equipped to undertake modern slavery due diligence for our organisation
Other

28b. Are these KPIs reviewed by senior management on an annual basis?

- Yes
- No

29. Please provide a summary of your organisation's objectives and plans to improve how you manage modern slavery risks in the next 12 months.

- **Please provide details**
We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery. Our Directors, workers and contractors continuously monitor how we manage MS risks and through our regular training sessions ensure that all the MS objectives are met

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