Modern Slavery Policy

Introduction

This policy applies equally across all Supreme Group businesses (hereafter, “the Company”).

What is Modern Slavery?

Modern slavery is an all-encompassing term to describe the offences of human trafficking and slavery, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain in a direct violation of their fundamental human rights.

The Company has a zero-tolerance approach to modern slavery in its operations and supply chains. We are committed to acting ethically, identifying risks, responding to concerns and improving our preventative controls.

Scope

This policy applies to all Supreme Group employees, workers and approved third-party contractors operating on the Company’s behalf. We expect suppliers and recruitment partners to uphold equivalent standards.

The Company’s aim is to use all reasonable endeavours to ensure no modern slavery or human trafficking in any form is taking place in our supply chain or in any part of our business.

To support this commitment, we:

- Conduct risk assessments and due diligence to identify and address potential risks of modern slavery.
- Require our suppliers and partners to comply with ethical labour standards and human rights obligations.
- Provide training and awareness for staff to recognise and report potential concerns.
- Maintain reporting mechanisms to ensure issues can be raised safely and confidentially.
- Monitor compliance and take corrective action where necessary.

Our Labour and Human Rights Commitments

- Comply with applicable local and national laws, including employment, immigration, equality, human rights and modern slavery legislation.
- Allow workers to terminate their employment in accordance with lawful notice requirements, without threats or unlawful penalties.
- Respect freedom of movement; workers must not be unlawfully confined, controlled or prevented from leaving work or accommodation.
- Respect freedom of association, including workers’ rights to join or not join a trade union and engage in lawful collective representation.

- Prohibit violence, threats, harassment, intimidation, coercion and abuse.
- Prohibit worker-paid recruitment fees, including fees charged by recruitment agents to obtain work; investigate and address any such charges.
- Prohibit forced or compulsory overtime; overtime must be voluntary and comply with working-time rules and contractual terms.
- Prohibit child labour and verify age and eligibility to work before employment.
- Prohibit unlawful discrimination in recruitment, employment, pay, training, promotion and treatment at work.
- Never confiscate or retain workers' original passports, identity or immigration documents; check documents lawfully and return originals promptly.
- Support people affected by modern slavery to access safeguarding, specialist advice and appropriate routes to remedy, compensation and justice.

Putting Our Commitments into Practice

- Carry out proportionate modern slavery risk assessments and checks on recruitment arrangements, suppliers and subcontractors.
- Complete appropriate identity, age and right-to-work checks without retaining original identity documents.
- Provide relevant staff with guidance on warning signs and how to report concerns.
- Review concerns promptly, keep appropriate records and take corrective action where necessary.

Reporting Modern Slavery and Human Trafficking Concerns

Anyone who suspects modern slavery or human trafficking must report it promptly. Victims may not identify themselves as such. Reports will be treated sensitively, with information shared only where necessary to protect people and investigate concerns.

1) Identify a concern or receive information suggesting possible exploitation.

2) If anyone is in immediate danger, call 999. Do not confront a suspected exploiter or put anyone at further risk.

3) Report concerns to a line manager or HR; if the manager may be involved, contact HR or a senior manager directly. Genuine concerns raised in good faith will not result in retaliation.

4) HR and senior management will assess and record the concern, consider immediate safeguarding needs, refer to police or specialist authorities where appropriate, and support access to independent advice and available remedies.

This policy has been formally approved by the Board of Directors of Supreme Group.

Signed: 

Andy Lane, Managing Director

For and on behalf of the Board of Directors

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