



Modern Slavery and Human Trafficking Policy

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This document forms part of our Management Systems and compliance is mandatory for all staff and contractors. If you find any weaknesses in the document or examples of non-compliance, please report it to the Compliance Team at infosec@bcs.uk.

1. Introduction

Modern slavery is a crime and a violation of fundamental human rights. 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 to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in 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 our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, and to ensuring that we comply with the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we require that our suppliers hold their own suppliers to the same high standards.

2. Scope

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, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for the Policy

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Legal Team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Legal Team.

4. Compliance

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or could be perceived as, a breach of this policy. You must notify your manager or the Legal Team as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify your manager or the Legal Team as soon as possible. You can also report it in accordance with the Whistleblowing Policy (available on the Green Room).

The Whistleblowing Policy expects you to report any concerns to your line manager or divisional director on discovery. If, under the circumstances, this is unsuitable then you can report your concerns directly to the Chief Executive.

All reports are held in strictest confidence and will be investigated either internally or externally as appropriate.

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

We aim 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. We 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Legal Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Green Room.

5. Communication and Awareness of the Policy

All individuals who work for us should be aware of the importance of the issue of modern slavery and the risk our business faces from it.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Due Diligence

As part of our efforts to identify and mitigate risks, we:

- Conduct appropriate checks on new suppliers and business partners
- Use supplier questionnaires where appropriate
- Include contractual provisions requiring compliance with modern slavery laws
- Reserve the right to audit suppliers where risks are identified
- Take appropriate action, including termination of relationships, where non-compliance is identified.

7. Supply Chains

We expect all suppliers and business partners to:

- Comply with applicable modern slavery laws
- Maintain their own policies and controls where appropriate
- Implement due diligence processes within their own supply chains
- Notify us of any actual or suspected instances of modern slavery

These requirements are communicated at the outset of business relationships and reinforced as appropriate.

8. Breaches of this Policy

Where modern slavery risks or incidents are identified, we will take appropriate action. This may include:

- Investigating the issue internally or with external support
- Working with suppliers to address and remediate issues where possible
- Escalating concerns where necessary
- Terminating relationships where appropriate

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Subject to the specific contractual obligations in place, we may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



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