

Anti-Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1. Modern slavery and human trafficking are crimes and a violation of fundamental human rights. The various forms it can be found in are servitude, forced labour and unlawful movement of persons. These all include the deprivation of a person's liberty to exploit them for personal or commercial gain.
- 1.2. Articulacy UK Ltd has a zero-tolerance approach to modern slavery and human trafficking within its business and those it works with.
- 1.3. This policy applies to:
 - 1.3.1. Anybody working for Articulacy UK Ltd, on our behalf, in any capacity, including employees and freelancers at any level.
 - 1.3.2. Any contractor we may use.
- 1.4. We are committed to:
 - 1.4.1. Acting ethically and with integrity in all our business dealings and relationships.
 - 1.4.2. Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our business.
 - 1.4.3. Ensuring there is transparency in our approach to tackling modern slavery in our business adhering to the Modern Slavery ACT 2015.
- 1.5. We expect the same high standards from all our contractors. As part of our contracting process we include specific prohibitions against modern slavery.

2. Identifying modern slavery

- 2.1. Modern slavery can be found in:
 - 2.1.1. Our business.
 - 2.1.2. In our contracted work.

2.2. There is no typical victim, and some victims do not know they have been exploited and are entitled to help and support. However, the following signs could suggest someone is a victim of modern slavery or human trafficking:

2.2.1. They do not have possession of their own passport or identification (ID)

2.2.2. The person is acting as if they are being instructed by someone.

2.2.3. The person allows other people to speak on their behalf when being spoken to directly.

2.2.4. The person is dropped off and collected from work.

2.2.5. The person is withdrawn or appears frightened.

2.2.6. The person does not seem to be able to contact friends and family freely.

2.2.7. The person has limited social interaction or contact with people outside of their immediate environment.

2.3. The above list is not exhaustive. Someone may display these signs but not be a victim of human trafficking or slavery.

3. Responsibility for this policy and compliance

3.1. The directors have overall responsibility for ensuring this policy complies within the company's legal and ethical obligations.

3.2. Julia Ward, Director, has responsibility for implementing this policy and dealing with any queries.

3.3. All employees must comply with this policy.

3.4. All contractors must comply with this policy.

4. Reporting modern slavery

4.1. Any employee or contractor must report any incidence or suspicion of modern slavery at the earliest stage possible to:

4.1.1. If you are an employee, to Julia Ward

4.1.2. If you are a contractor, to your primary contact with Articulacy UK Ltd who will in turn contact Julia Ward

5. Publication of this policy

5.1. This policy is available on Articulacy UK Ltd's website.

6. Breaches of this policy

6.1. Any body who breaches this policy may face disciplinary action, which could result in dismissal for misconduct.

6.2. Any work can be terminated by Articulacy UK Ltd with a contractor if they are in breach of the policy.

7. Policy review

7.1. Employees are invited to suggest appropriate changes to the policy.

7.2. The policy can be changed at anytime and is to be reviewed once a year.

This policy was last reviewed by Articulacy on 14th September 2020



Signed on behalf of Articulacy

Print name here
Date

Leanne Fennell
14th September 2020