

## Modern Day Slavery

# Company Policy

This document is applicable to all companies within 3t,  
please refer to IMS M 001 Section 2 for organisational context

Doc No. 3t Po 037  
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Release Date 16/03/2020

### Approval

Name(s): Kevin Fraklin                      Review Date: Sep 2023

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Position(s): CEO                              Next Review: Sep 2024

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Signature(s): 

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## Amendments

<b>Version</b>	<b>Amendment</b>	<b>Page</b>	<b>Date</b>	<b>Made By</b>	<b>Approved By</b>
2	Annual review – no updates	All	04/01/2021	B Cowen	E Howorth
3	Updated Approval Section	1	05/05/2021	James Grand	Beth Cowen
4	Annual review – no updates	All	07/01/2022	B Cowen	E Howorth
5	Annual review – no updates	All	04/01/2023	B Cowen	E Howorth
6	Full document review and update	All	06/09/2023	Martin Hottass	Jill Ogilvie
7	Updated in line with name change	All	31/10/2023	Charlie Spiller	Beth Cowen

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This statement is made pursuant to Section.54 (1) of the Modern Slavery Act 2015 and sets out the steps that 3t has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. 3t has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## 1. Our Business

The training provision and activities are varied through multiple disciplined areas and sectors with a multi-disciplined supply chain to support the different aspects and provisions of the business.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, aligned with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

3t will achieve these aims by utilising initiatives to identify and mitigate risk in the following ways (But not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review of practices for checking all employees are paid at least the minimum wage and have the right to work;
- The encouragement of the reporting of concerns and the protection of whistle blowers.
- 3t will not knowingly support or deal with any business involved in slavery or human trafficking.
- 3t will have zero tolerance to slavery and human trafficking and expect all those in the supply chain and contractors to comply with 3t's values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking across supply chains and the business, 3t provides training to relevant members of staff. All Directors have been briefed on the subject.

The following key performance indicators (KPIs) are utilised to measure effectivity and to ensure that slavery and human trafficking is not taking place in any part of the business or supply chains:

- Completion of Audits by Directors, Managers Safety managers and Safety Advisors;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes the 3t slavery and human trafficking statement.

## 2. 3t Global and 3t Training Services Policies

The following internal policies ensure that 3t and its subsidiary 3t Training Services is conducting business in an ethical and transparent manner. These include:

1. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
2. Corporate, Social & Ethical Responsibility Policy. 3t core values encapsulate business philosophy. The company is an ethical business conducted with integrity, independent, with a true passion for the business, our employees, clients and wider community.
3. Prevent Radicalisation/Extremism Policy. 3t Training Services have a responsibility in fostering shared values and promoting cohesion. 3t Training Services will focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can manifest within the training provision.
4. Safeguarding Policy. 3t Training Services has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all users of the training provision, with particular reference to young people and vulnerable adults, receiving training at 3t Training Services.
5. Approved Supplier Procedures. Any organisation can apply to 3t to become an approved supplier. An approved supplier is an organisation whose policies and procedures have been judged by 3t Training Services to meet the same standards as their own policies and procedures.

## 3. Our Suppliers

3t Training Services operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions].

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light]

#### **4. Training**

We regularly conduct training teams involved with procurement so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

#### **5. Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

For transparency the company will publish the Modern Day Slavery & Trafficking Act 2015 Policy Statement on its website for the public, stakeholders and employees to view.

This policy applies to all those employed by 3t.