

WI1516 - Modern Slavery and Human Trafficking Policy

Purpose

The purpose of this policy is to:

- a) set out our position on modern slavery and human trafficking
- b) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- c) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

Scope

This policy applies to all employees at Reliance Precision Limited and Reliance Precision Manufacturing (Ireland) Limited. It covers all persons working for us or on our behalf in any capacity, at all levels, including directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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Definitions

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 in order to exploit them for personal or commercial gain.

Process Details

Policy statement

As a business, 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 in 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, consistent with our disclosure obligations under the Modern Slavery Act 2015 (UK) and under the Criminal Law (Human Trafficking) Act 2008 as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and also the EU Charter of fundamental rights, where Article 5, states that no one will be held in slavery or servitude, Article 5.2 asserts that no one will be required to perform forced or compulsory labour and Article 5.3 states that trafficking in human beings is prohibited (Ireland).

We expect the same high standards from all of our contractors, suppliers and other business partners and, 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 expect that our suppliers will hold their own suppliers to the same high standards.

Responsibility for the policy

The Compliance Manager 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.

Training and communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Your responsibilities and how to raise a concern

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 suggest, a breach of this policy.

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 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, you must notify your manager or the Compliance Manager or our free confidential whistleblowing helpline on 0844 892 4413 operated by Health Assured as soon as possible.

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 Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Policy WI1306 Grievance Procedure.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, in line with WI1112 Disciplinary Procedure which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Projects For the US Government

Employees working on contracts in support of US Government defence programmes will be subject to the Human Trafficking rights and remedies established at [52.222-50 Combating Trafficking in Persons](#) (Nov 2021) as set out in the extract detailed from the Solicitation Provision and Contract clause [22.1705](#):

[52.222-50 Combating Trafficking in Persons](#) (Nov 2021) in particular reference to [\(b\) policy](#) and [\(c\) contractor requirements](#).

[Extract from 52.222-50 Combating Trafficking in Persons (Nov 2021) – date accessed 18/09/2024]

Management System Documents

Controlling Procedure

[QP documents]

Document Number	Document Title
BP0250	Procurement Strategy

Associated Work / Inspection Instructions

[WI/II]

Document Number	Document Title
WI1306	Grievance Procedure
WI1236	Whistleblowing Policy
WI1112	Disciplinary Procedure

Associated Forms

[QA documents]

Document Number	Document Title
QA0197	Supplier Quality Questionnaire
QA0009	Instructions to Suppliers