



Policy

Anti-Slavery and Human Trafficking

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Policy Group: Moral and Ethical

Policy Number: 818

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Approver:



Mark Bass | Managing Director

Distribution

This document has been reviewed by and distributed to:

Name	Job Title	Issue date	Version
Gareth Bass	Online Solutions Lead	2020_08_17	V4_2020_08_14
Debbie Fawcett	Head of Internal Production	2020_08_17	V4_2020_08_14
Ken Thompson	IT Manager	2020_08_17	V4_2020_08_14
Natasha Hickling	Head of Marketing and Brand	2020_08_17	V4_2020_08_14
Chris Everest	Supply Chain Manager	2020_08_17	V4_2020_08_14
Amy Herring	Contract Implementation Manager	2020_08_17	V4_2020_08_14
Andy Bass	Sales Director	2020_08_17	V4_2020_08_14
Simon Cakebread	Finance Manager	2020_08_17	V4_2020_08_14
Matt Elder	Head of Operations	2020_08_17	V4_2020_08_14
Ana Dieaconu	Design Studio Team Leader	2020_08_17	V4_2020_08_14
Mark Bass	Managing Director	2020_08_17	V4_2020_08_14

It is the responsibility of the Heads of Departments and Line Managers to ensure their team's members have read and understand this policy [where appropriate], and to identify specific needs in relation to it such as training, equipment and/or tools.

Revision History:

Issue	Date	Amendments
V2	2016_11_22	Updated
V3	2018_11_19	Updated
V4	2020_08_14	Updated

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1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- Forced and compulsory labour or human trafficking
- Slavery
- Servitude
- Child labour
- Discrimination
- Harsh, cruel and degrading practises
- Unfair wages
- Excessive working hours
- Unsafe and Unhygienic working conditions

All of the above have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and 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 in accordance with the Modern Slavery Act 2015.

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. We expect the same high standards from all of our sub-contractors, suppliers and other business partners, and as part of our sub-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.

This policy applies to all companies or persons working for Murray Uniforms Ltd., or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, sub-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 in accordance with legislative changes or good business practise.

2. Responsibilities



The Managing Director of Murray Uniforms Ltd. has overall responsibility for ensuring that this policy complies with our legal and ethical obligations and for holding regular meetings to ensure progress is being made in areas of the business which can have an impact on modern slavery, and that all those under our control comply with it.

The Head of Supply Chain 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 Compliance Manager.

3. Compliance

This policy applies to all companies or persons working for Murray Uniforms Ltd., or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, sub-contractors, external consultants, third-party representatives and business partners who must ensure that they 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 suggest, a breach of this policy
- You must notify your Head of Department or Line Manager or the Compliance Manager 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 Head of Department or Line Manager or the Compliance Manager, or report it in accordance with Murray Uniforms Ltd. 810 Whistle Blowing policy as soon as possible
- 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 Head of Department or Line Manager or the Compliance Manager
- 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 Grievance Procedure

4. Supplier Monitoring

Our process of mapping our suppliers and deciding what level of monitoring is required is determined by the tier in which the supplier falls. We currently have 5 tiers which have a different form of monitoring and levels of transparency:

Tier 1	Garment manufacturers we have a direct trading relationship with	Contact with the supplier is directly with Murray Uniforms Ltd. employees	Fully mapped
Tier 2	Agents are the chain of communication between Murray Uniforms Ltd. and the supplier	PO's are placed with the agent who places orders in accredited and authorised factories	Fully mapped
Tier 3	Accessory Suppliers	Trim and component suppliers we buy from	Fully mapped
Tier 4	Fabric mills	Fabric mills we buy from giving greater transparency	Fully mapped
Tier 5	Stockists	Suppliers of goods that are not made to order	Partially mapped

5. Identifying Modern Slavery

Modern slavery may be found in:

- Our business, for example our cleaning and catering workforce
- Our supply chains
- Outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being instructed or coached by someone else
- The person allows others to speak for them when spoken to directly
- The person is dropped off and collected from work
- The person is withdrawn or appears frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside of their immediate environment

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

6. Communication and Awareness

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 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.

7. Breaches of this Policy

- Any employee of Murray Uniforms Ltd. who breaches this policy will face disciplinary action, 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

8. Presentation and Review

This policy and related documentation will be reviewed, and where necessary revised annually, unless an earlier revision is prompted by changes in legislation or procedures etc.

The Directors of Murray Uniforms Ltd. are ultimately responsible for the implementation and effectiveness of this policy, and as part of the annual review [or earlier if prompted by changes in legislation], the effectiveness of this policy will be considered.