

THE NEALE AGENCY

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Modern Slavery Policy

Contents

- 1 Statement of intent
- 2 Purpose
- 3 Definition of Modern Slavery
- 4 Economic Sustainability
- 5 Aims and Expectations
- 6 Whistle Blowing
- 7 Code of Conduct
- 8 Recruitment/Agency Workers
- 9 Due Diligence
- 10 Training
- 11 Review
- 12 Authorising Signature

1.0 Statement Of Intent

This Policy applies to The Neale Agency and all subsidiaries which include Periscope Live, Torpedo Production and Sonar Design.

This policy sets out the commitments of our company in relation to modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and our organisation is committed to preventing it in our business activities and ensuring that our supply chains are free from, slavery and human trafficking.

This policy applies to employees at all levels of the company as well as directors.

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

It will be reviewed on a regular basis to ensure it complies with relevant UK legislation. This policy is made freely available on the company server, in the Health and Safety Hub office and via the Breathe HR software accessible by all staff.

2.0 Purpose

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

3.0 Definition of Modern Slavery

There are a number of crimes that are covered under the definition of modern slavery; these are:

- Bonded labour – individuals who are forced into debt by paying to get a job or mandatory equipment or have their passports taken to restrict their movements.
- Forced labour – individuals who are forced to work long hours for little or no pay in poor conditions, under verbal or physical threats to themselves or their families.
- Trafficking – individuals or groups moved from one area to another for forced or bonded practices.
- Criminal exploitation – where a victim is exploited to commit a crime, for example, pickpocketing, shoplifting, drug trafficking, and cannabis cultivation.
- Sexual exploitation – including sexual abuse, forced prostitution, and abuse of children for the production of images or videos.
- Domestic servitude – where an individual is forced to work in private households with restricted freedom and work long hours for little or no pay.

Less commonly identified crimes include organ removal, forced marriage, and illegal adoption.

4.0 Aims and Expectations

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to ensuring modern slavery is not taking place anywhere in our own business or our supply chain.

In our supply chain, we ask our suppliers to implement due diligence for their own suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chain.

As an equal opportunity employer, we are committed to creating and ensuring a non-discriminatory safe and respectful working environment for our staff. We want all employees to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective and current employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We take a strict approach to acts, actions, and behaviours deemed to be in breach of this policy statement, and any such incidents will be dealt with in accordance with the applicable disciplinary procedure. Breaches of this policy statement may amount to gross misconduct resulting in summary dismissal.

We will not knowingly trade or partner with any organisation which is involved in modern slavery or human trafficking, and we may terminate relationships with other individuals and organisations if they are believed to have breached this policy.

5.0 Implementation and Policies

The HR Consultants who undertake human resource activity on behalf of the company will ensure that the current modern slavery policy is uploaded and available to all members of staff through their Breathe HR dashboard.

The company will ensure all employees have the right to work in the UK and ensure their employment is undertaken with compliance to UK employment laws and at a fair rate of pay. The right to work of perspective employees will be undertaken at interview stage.

Procurement, and Operations are responsible for monitoring suppliers to comply with the Modern Slavery Act 2015 and any checks are conducted and reviewed and discussed with the directors if any concerns are raised.

The directors are responsible for investigations and due diligence and demonstrate a zero-tolerance approach to exploitation in relation to known or

suspected instances of slavery and human trafficking, and recommendations and actions are carried out in accordance with UK law.

6.0 Whistleblowing Policy

We encourage an honest and ethical culture and encourage all our employees and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery, human trafficking or to any form of bribery or corruption.

Our whistleblowing procedure (confidential reporting) is designed to make it easy for workers to make disclosures, without fear of retaliation.

7.0 Code of Conduct

Our employment policy makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

8.0 Recruitment/Agency Workers Policy

If required, we use only reputable employment agencies to source labour.

9.0 Due Diligence

We undertake due diligence when considering taking on new suppliers.

Our due diligence and reviews include:

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- using the ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct.

10.0 Training

We will work towards all staff within the company with a director or management role to complete training on modern slavery. This will enable them to understand what modern slavery is and the methods used to exploit individuals, identify the different types of exploitation, and recognise the signs associated with each one and to how to respond to individuals who have made a disclosure.

11.0 Review

This policy will be reviewed every 12 months or if any incident or report of modern slavery triggers and earlier review to be made.

12.0 Authorising Signature

Signed: 

Date: 31/04/25

Martin Neale – Managing Director