



MITSkills Ltd Anti-Slavery Policy and Statement

Date established:	July 2021
Updated:	Annually this version 270622
Reviewed:	Annually or as updated by ESFA
Purpose:	This policy aims to set out the position of MITSkills in regard to The Modern Slavery Act (MSA 2015) which consolidates offences relating to trafficking and slavery – MITSkills does not currently have the financial scale to have to legally issue a policy or statement but in line with best practice has issued the following Policy.

Policy Definitions: References in this policy to “we”, “us” and “our” are to the Directors of MITSkills Limited. References to “you” and “your” are to those responsible for complying with the policy, as set out under ‘Policy Compliance’ below. Modern Slavery: is a term used to encapsulate offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. Slavery and servitude: this is where people are dehumanised, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labour. Forced or Compulsory Labour: this is where someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse. Human trafficking: relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

Policy Statement: 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 to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery. 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. 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 and require that



our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Policy Responsibility: the Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Responsibility for updating the policy and for producing an annual statement has been delegated by the Operations Director.

Responsibility for ensuring the policy is implemented has been delegated by the Managing Director to the Operation Director (as compliance manager). Executive Board Directors have responsibility for monitoring risk in their areas and in their supply chains. 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 Managing Director and Operations Director's Office.

Policy Compliance: You must ensure that you 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 manager or the Director of Operations or follow the Whistleblowing Policy as soon as possible if:

- you believe or suspect that a breach of this policy has occurred or may occur in the future
- you have any concern or suspicion that may be an issue in respect of modern slavery in any part of our business, or within the supply chains of any third-party suppliers; and / or
- you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our own business or any part of our supply chains constitutes any of the various forms of modern slavery.

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 by reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our 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 in line with our Grievance Policy.

Policy Communication: Awareness of this policy, and 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. 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. Our Policy and Statement which reflects the commitments outlined in this policy is published on MITSkills website.

Policy Breaches: Any employee 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. Breach of this policy may lead to prosecution under the Modern Slavery Act.

Policy Review: This policy will be subject to review annually by the Managing Director and Board. The current version of the policy will be published on MITSkills.com.

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