



Modern Slavery & Human Trafficking Policy

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1. Introduction

This policy sets out Fiveways actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the fleet industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its activities, and to ensure that its supply chains are free from slavery and human trafficking.

2. Relevant Policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- ★ **Ethics Policy:** An ethical business is one of Fiveways core principles, which is set out in this policy to show the Company's commitments to follow ethical business practices. The Company will not tolerate any wrongdoing or impropriety at any time, including any form of modern slavery. The Company will take the appropriate measures to act quickly in correcting issues if the ethical code is broken. This policy applies to employees, contractors, consultants and any other workers who provide services.
- ★ **Whistleblowing Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete a confidential disclosure form.
- ★ **Employee Code of Conduct:** The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- ★ **Health and Safety Policy:** The policy clearly indicates that all employees, visitors and other workers are to cooperate with Fiveways in the implementation of this policy by 'constantly improving Health and Safety standards through the compliance of all relevant statute' including the Modern Slavery Act 2015.
- ★ **Recruitment Selection Policy:** The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

3. Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have adopted the following due diligence procedures;



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- ★ We require from our suppliers, before appointing them, detailed information of any plans in place in the event of labour right concerns are identified in their supply chain
- ★ With regards to national or international supply chains, our contact point is preferably with a UK company or branch and we expect these entities to have suitable slavery and human trafficking policies and processes
- ★ We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

4. Our Policy on Child Labour

We require all our suppliers to adhere to the standards set out by International Labour Organisation as regards the employment of children and young people. We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, and the physical punishment, abuse or involuntary servitude of any worker. We expect our suppliers and contractors with whom we do business to uphold the same standards. In particular;

- ★ children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 16; and
- ★ those under 18 must not be required to perform hazardous duties.

5. Learning

We invest in educating our employees to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through training, employees are encouraged to identify and report any potential breaches of the Company's policies. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate these from our business and supply chain.

6. Breaches of this Policy

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 Suppliers and other third parties if they breach this Policy, details of actions undertaken with regard to remediation and outcomes will be published in the Company's Annual Modern Slavery Statement, and take any action required by the UK Modern Slavery Act 2015.





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Latest Amendment

Reason	Section Amended
Creation of Policy	Creation of Policy
Annual Review of Policy – June 2023	No updates required
Annual Review of Policy – June 2024	No updates required

	Prepared By	Authorised By
Date	20 th June 2024	20 th June 2024
Signature		
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