

US2U Consulting Anti-Slavery Policy

August 2017

Policy Aims

This policy supports the commitment of US2U Consulting to limiting the risk of modern slavery occurring within its own business or infiltrating its supply chains or any other business relationship.

The policy applies to all persons working for or on behalf of US2U Consulting in any capacity, including employees, directors, contractors, associate consultants and any other third party representative.

US2U Consulting expects all who have, or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

US2U Consulting will aspire to only do business with organisations that fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that US2U Consulting is required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

Definitions

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery where ownership is exercised over an individual
- Servitude which involves the obligation to provide service imposed by coercion
- Forced and compulsory labour which is all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- Human trafficking which involves arranging or facilitating the travel of another with a view to exploiting them.

Although not specifically referenced in the MSA, US2U Consulting will also not tolerate child labour. Whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

Implementing the Policy

To underpin its commitments, US2U Consulting aims to implement the following measures:

- Conducting risk assessments to determine which parts of US2U Consulting's own business and which of its supply chains are most at risk from modern slavery so the company can focus its efforts on those areas most 'at risk'.
- Where appropriate, as informed by risk assessments, US2U Consulting will undertake pre-screening of prospective suppliers as part of our the processes in relation to the effectiveness of existing safeguarding controls and practices including, but not limited to those in relation to preventing modern slavery occurring within their organisation and within their own supply chain.

Responsibility for this Policy

The company director has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations.

The company director also has the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All staff and associates are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and Staff Awareness Training

US2U Consulting will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the company's induction processes.

Breaches of this Policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by staff or a director of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from a director.