

## ABP UK People Change

# MODERN SLAVERY POLICY

## Preventing Hidden Labour Exploitation



### ABP UK POLICY STATEMENT

ABP UK commits to developing and adopting a proactive approach to tackling all aspects of Modern Slavery and hidden labour exploitation in its workplaces and as far as possible within its supply chains.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

### Coverage

This policy applies to all ABP UK sites, including Scotland and Northern Ireland.

### Responsibility

Our ABP UK People Change Director has overall responsibility for this policy with the support of the UK People Change Managers.

All managers at ABP UK have an ethical and moral responsibility to ensure that any labour exploitation of any kind is investigated, duly reported and eradicated.

### Policy Commitments

ABP UK has committed to:

1. Have a designated UK People Change Manager to attend "Tackling Hidden Labour Exploitation" training, liaise on a regular basis with the GLA and its customers and to have responsibility for developing and operating company procedures and practical solutions relevant to this issue.



2. Ensure that throughout all its all ABP sites in the UK, it is accepted and known that job finding fees are a business cost, and will not allow these to be paid by job applicants and/or employees. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and are aware of the signs of such conduct.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police and to provide direct contact details and GLA information to employees on each one of our sites in the UK
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through:
  - Training
  - Workplace posters
  - Worker leaflets
  - ABP UK Modern Slavery training and awareness updates sessions for our managers
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately. ABP UK has a dedicated telephone line and a separate UK People Change e-mail address for the confidential reporting of known or suspected cases of Modern Slavery and labour exploitation.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above and reduce the number of agency workers in our business across the UK.
10. Provide our most vulnerable employees with access to free English language lessons, not only for the development of the skills in the workplace but also to encourage communication and reporting of labour exploitation.
11. Provide employees with independent and free access to translators in official communications to further the opportunities for employees to report labour exploitation and minimise the risk of control and power by others.