



WOVEN

Modern Day Slavery Policy – External

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Approved by: Executive Leadership Team



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Introduction

- 1.1. At The Company we are committed to doing the right thing in all aspects of our business. This requires that every day everyone working for us needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.
- 1.2. Our culture is built on four key values. These shape our behavior toward customers and toward one another. Together, they drive our organisation forward. The values are Integrity, Excellence, Teamwork, and accountability.

2. Scope and Objective

- 2.1. This policy applies to all The Company Employees and should be used alongside other The Company policies and procedures.

3. Applicability

- 3.1. Internal Parties - This policy applies to all employees, officers and all consultants and contractors.
- 3.2. External Parties - The provisions outlined in this policy apply to all potential employees of The Company and all its subsidiaries, referred to as 'The Company' throughout this document.
- 3.3. The procedures and principles set out herein must be followed at all times by The Company, its employees, agents, contractors, or other parties working on behalf of The Company.

4. Related Documents / References

- POL-001 - Document Management System Framework Policy
- POL-058 - Employee Handbook Policy
- POL-060 - Ethical Policy and Code of Conduct

5. Modern Slavery Statement

- 5.1. **Organisation** - This statement applies to The Company Solutions Limited (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2022/2023.

- 5.2. **Organisational Structure**

- a) The Organisation is made up of 5 Levels:
 - The Executive Level Team (ELT).
 - Director, Head Of.
 - Head Of, Senior Manager.



- Manager, Team Leader.
- Advisor, Administrator.
- b) ELT report into the CEO.
- c) Main office is in Bristol also have aq site in Ipswich. We also have many of our employees working from home.
- d) We provide customer service, admin support and sales for several businesses across the UK, our main duties are checking on customers ordered goods and reorganizing delivery, our sales range from cinema tickets to breakdown cover.
- e) The labour supplied to the Organisation in pursuance of its operation is carried out in the country it is required.

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5.3. Definitions

- a) The Organisation considers that modern slavery encompasses:
 - Human trafficking.
 - Forced work, through mental or physical threat.
 - Being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
 - Being dehumanised, treated as a commodity, or being bought or sold as property.
 - Being physically constrained or to have restriction placed on freedom of movement.

5.4. Commitment

- a) The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.
- b) The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- c) No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and South Africa.
- d) We work alongside the Trade Union for office workers and where needed we involve them in any changes we require.

5.5. Potential Exposure

- a) In general, the Organisation considers its exposure to slavery/human trafficking to be limited. Nevertheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19



- b) During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.
- c) The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.
- d) The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.
- e) During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.
- f) In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.
- g) The Organisations modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

5.6. Steps

- a) The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.
- b) The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.
- c) In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:
 - No steps were required during this time.

5.7. Key Performance Indicators

- a) The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains. The Organisation ensures all employees earn no less than the National Living Wage and the Planning Team ensure they have scheduled in the required amount of breaks and rest days.

5.8. Policies

- a) The The Company Joint Schedule 5 (Corporate Social Responsibility) also defines information relating to Modern Slavery.

5.9. Training

- a) The Organisation provides the following training to staff to effectively implement its stance on modern slavery:
 - Induction training.
 - This code of practice.



5.10. Slavery Compliance Officer

- a) The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

5.11. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

6. Policy Compliance & Responsibilities

6.1. Compliance Measures

- a) Compliance with the above policy statements can be measured by example evidence, which will vary depending on the supporting standards and guidelines implemented to support this policy.
- b) Evidence of compliance can be presented in hard copy or electronic format.

6.2. Enforcement

- a) As noted above, this policy applies to all The Company employees, officers, management, and all consultants and contractors. Violations of this policy may result in disciplinary action, up to and including termination of employment and / or legal action.
- b) It is intended that this policy will be reviewed annually and that this process used to ensure the policy remains fit for purpose.

7. Document Management and Policy Compliance

- 7.1. This policy shall be deemed effective as of 6 September 2022. No part of this policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date. Past policies can be viewed on the Documents Control Log. The Document Control details can be found at Appendix A.
- 7.2. This policy will be updated annually and as necessary to reflect best practice and to ensure compliance with any changes or amendments to relevant legislation.
- 7.3. For amendments to this policy email the Document Management Controller at risk&compliance@wearewoven.com.
- 7.4. Violations of this policy may result in disciplinary action, up to and including termination of employment and / or legal action.

8. Glossary of Definitions

- 8.1. The glossary of definitions can be found at Appendix B.

9. ISO Mapping with Industry Standards

- 9.1. The ISO Mapping with industry standards can be found at Appendix C.



Appendix A – Document Definition and Control

DOCUMENT DEFINITION

This document is a policy. For a full description of document types, see POL-001 Document Management System Framework Policy.

DOCUMENT CONTROL

Document control change and amendments are listed in the table below:

Name	Role	Type of change/ Amendment	Document Status	Version	Date
Lara Siebe	Risk and Compliance Assistant	Format / Review	Review	0.1	5 Sept 2022
Jan Cabdy	Chief Risk & Assurance Officer	Review	Review	0.2	6 Sept 2022
Hannah May Tatton	Chief People Officer	approval / sign off	Published	1.0	6 Sept 2022
Parminder Bains	Senior Solutions Architect	Annual Review	Review	1.0	24 May 2024
Kat Horton	Head of Compliance	ELT Sign off / Approved	Published	2.0	24 May 2024
Kat Horton	Head of Compliance	Annual Review	Review	2.0	23 May 2025

Appendix B – Glossary of Definitions

Term	Definition
“POL”	Policies
“Policies”	A set of directional statements and requirements aiming to protect corporate values, assets, and intelligence. Policies serve as the foundation for related standards, procedures, and guidelines.
“Procedures”	A set of step-by-step instructions for implementing policy requirements and executing standard practices.
“PRC”	Procedures
“SRS”	System Records
“TSD”	Technical Standards



Appendix C – ISO Mapping with Industry Standards

The table below maps the policy with the security domains of ISO27001:2013 Security Standard.

Standard requirement	Achieved
A5.1.2 Review of the policies for information security Control The policies for information security should be reviewed at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy, and effectiveness.	☒
7.5 Documented information 7.5.1 General The organisation's information security management system shall include: a) Documented information required by this International Standard; and b) documented information determined by the organisation as being necessary for the effectiveness of the information security management system.	☒
7.5.2 Creating and updating When creating and updating documented information, the organisation shall ensure appropriate: a) Identification and description (e.g., a title, date, author, or reference number); b) Format (e.g., language, software version, graphics) and media (e.g., paper, electronic); c) Review and approval for suitability and adequacy.	☒