

Modern Slavery And Human Trafficking Statement 2024

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MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Organisation

This statement applies to SafeLane Global Limited (referred to in this statement as 'the Organisation').

Organisational structure

The organisation is controlled via the Chief Executive Officer and consists of office staff (permanent) and site staff (permanent and casual).

The organisation's head office is located in Phocle Green, Ross-on-Wye, HR9 7XU. Office staff are based in Ross on Wye and/or home-based. Site staff are based both nationally and internationally.

The Board of Directors have overall responsibility for ensuring this policy is compliant with our legal and ethical obligations and that all those employed or contracted to the board are compliant. The Chief Executive Officer and Chief Financial Officer have primary and day to day responsibility for implementing this policy and monitoring its use and effectiveness.

The organisation focusses on mitigating explosive and hazardous material threats arising from Unexploded Ordnance (UXOs) and Explosive Remnants of War (ERW), countering security risks and thereby enhancing land and marine environments, globally.

The land-based services focusses on explosive threat mitigation and includes canine detection and protection, and combat engineering. It surveys for unexploded ordnance (UXO), provides improvised explosive device threat mitigation services (IED-TM) and has cleared multiple areas of landmines. It supports over 10,000 commercial, governmental and humanitarian partners globally.

The marine services detects conventional unexploded ordnance (UXO) and chemical munitions in any marine environment including offshore, inshore and nearshore. It can rapidly deploy in support of any marine operation.

The service provided by the organisation is on a consistent basis and is not regarded as seasonal.

The labour supplied to the organisation in pursuance of its operation is multinational and both local and internationally recruited staff from within the United Kingdom, Yemen, Saudi Arabia, Mozambique, Western Sahara, Kuwait, Somalia, South Sudan, South Africa, Afghanistan, Azerbaijan and Iraq and numerous other countries around the world.

Definitions

The Organisation considers that modern slavery and human slavery encompasses:

- Labour Exploitation: Victims are forced to work for nothing, low wages or a wage that is kept by their owner; work is involuntary, forced and/or under the threat of a penalty, and the working conditions can be poor
- Sexual Exploitation: Victims are exploited through non-consensual abuse or another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-legitimate purpose.
- Domestic Servitude: Victims are domestic workers who perform a range of household tasks (for example, cooking and cleaning); some live with their employers and have low pay, if any at all.
- Criminal Exploitation: Victims are forced to work under the control of criminals in activities such as forced begging, shoplifting, pickpocketing, cannabis cultivation, drug dealing and financial exploitation.

All of which can result in the victim being dehumanised, treated as a commodity or being bought or sold as property or being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015 and supports UN SDG 8.7 to end Modern Slavery, Trafficking and Child Labour. 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.

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.

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 countries in which it operates, and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to technology support, clothing, equipment, water, medical supplies and food.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist within its clothing and food supply chains because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, 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.

Steps

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. The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

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:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring that staff involved in buying or procurement receive training on modern slavery and ethical employment practices
- ensuring that staff involved in the recruitment and deployment of workers receive training on modern slavery and ethical employment practices
- continuing to take action to embed a zero tolerance policy towards modern slavery
- review of supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

Key performance indicators

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.

- Continue to review and monitor supplier questionnaires and information
- Continue to ensure all relevant staff obtain up to date training
- Recording and investigating reports of modern slavery within the labour supply chain and the supply chain for goods and services bought by SafeLane Global.

For Financial Year 2023, the KPIs can be reported as follows:

KPI	Target	Actual
Review and monitor supplier questionnaires and information	100%	100%
Ensure all relevant staff obtain up to date training	100%	100%
Recording and investigating 100% of reports of modern slavery	All reports received	0 reports received

Policies

The Organisation has the following policies which further define its stance on modern slavery:

- Anti-Corruption and Bribery Policy
- Anti-Harassment and Bullying Policy
- Equality, Diversity and Inclusion (EDI) Policy
- Grievance and Complaints Policy
- Health and Safety Policy
- Public Interest Disclosure Act (Whistleblowing) Policy

Slavery Compliance Officer

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's obligations.

Tim Illingworth – CEO



MAY 2024