

[Extract from the Website](#)

Anti-Slavery

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery

Exercising powers of ownership over a person

Servitude

The obligation to provide services is imposed by the use of coercion

Forced or compulsory labour

Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily

Human trafficking

Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

HOW IS IT RELEVANT TO US?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not. At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- our supply chain (including downstream seasonal workers)
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality

RESPONSIBILITIES

The Company, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

THE COMPANY

We will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- be clear about our recruitment policy (see Recruitment below)
- check our supply chains (see Supply chains below)
- lead by example by making appropriate checks on all employees, suppliers, etc to ensure we know who is working for us
- ensure we have in place an open and transparent grievance process for all staff
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

MANAGERS

Managers will:

- listen and be approachable to colleagues
- respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- remain alert to indicators of slavery (see Identifying slavery)
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- use their experience and professional judgement to gauge situations

COLLEAGUES

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting Slavery below)
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- tell us if you think there is more we can do to prevent people from being exploited

RISKS

We recognise that our supply chain is our biggest risk area for exposure to modern slavery. We operate in a sector where our suppliers may make use of seasonal workers employed on a variety of types of contracts. We manage these risk areas through our procedures set out in this policy and elsewhere.

OUR PROCEDURES

Anti-slavery statement

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We make this statement as part of our company reporting.

Our statement

Modern slavery is a complex and multi-faceted crime and tackling it requires everyone to play a part. Bordeaux Index opposes modern slavery in all its forms. We are committed to preventing exploitation and human trafficking and to protecting our workforce through the implementation of effective systems for transparency in all our business dealings.

SUPPLY CHAINS

Bordeaux Index does not and will not knowingly support or deal with any business involved in slavery or human trafficking. Bordeaux Index expects all those in its supply chain to be opposed to slavery and human trafficking. We seek to ensure that we can account for each step of our supply processes—we know who is providing goods and services to us and we are in the process of implementing systems to:

- Identify and assess potential risk areas in our supply chains;
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers.

RECRUITMENT

General recruitment

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We always ensure staff are legally able to work in the UK.
- We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, our HR team will follow our reporting procedures (See Reporting Slavery).

IDENTIFYING SLAVERY

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim.

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

REPORTING SLAVERY

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with the Director responsible for this policy who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the Director responsible for this policy before taking any further action.

TRAINING

We are working towards ensuring a higher level of understanding of the risks of modern slavery and human trafficking in our business.

MONITORING OUR PROCEDURES

We will review our Anti-slavery policy annually. We will provide information on any changes we make.

Approved by the Board of Directors of Bordeaux Index Limited and signed on their behalf by:

Oliver Boom
Director
Jan 2026