



Anti-Slavery Policy

📅 November 21, 2023(<https://www.totemic.co.uk/2023/11/21/>)

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Purpose

This policy communicates the reasons for having an anti-slavery policy and our standards in which we operate to ensure this policy is adhered to. We have a zero tolerance approach to slavery and we are committed to preventing acts of slavery or trafficking from occurring within our business and would look to expect these same standards reflected in our contractors, suppliers and other business partners.

Policy Aims

As part of our culture of good governance for good business, at Totemic (2014) Holdings Limited and our associated companies we operate to a set of core values which reflect our relationships with our principal stakeholder groups:

- Customers
- Shareholders
- Suppliers and team members.

We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by what ever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to modern slavery is: zero tolerance.

Policy Purpose

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Totemic (2014) Holdings Limited (the “Company”) and its associated companies with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

As a Group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Steps for prevention of modern slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas
- engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses
- where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Responsibility for the policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

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Contact

Tel: 0800 009 4148

Email us: info@totemic.co.uk

Address:

Totemic (2014) Holdings Limited,
Kempton House, Kempton Way,
Grantham, Lincolnshire,
NG31 7LE

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