

Modern Slavery

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Policy

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1. Introduction

The Company seeks to conduct its business honestly and with integrity. However, we acknowledge that all organisations face the risks of wrongdoing in their business activities and unknowingly harbouring malpractice. We believe we have a duty to act appropriately to identify such situations and attempt to remedy them.

The purpose of this policy is to prevent issues of modern slavery in our workplace and supply chains. Modern slavery is the exploitation of people for commercial or personal gain through slavery, servitude, forced or compulsory labour and human trafficking, as defined in the [Modern Slavery Act 2015](#).

2. Scope

This policy applies to:

- Individuals on our payroll and agency workers
- Individuals or companies who do business with us, such as clients, contractors, partners and particularly suppliers

3. Responsibilities

3.1 Leadership team

The leadership team (LT) has overall responsibility for the company's compliance with legal and ethical obligations for modern slavery. Our chief executive officer (CEO) authorises our [Modern Slavery Statement](#) and delegates responsibility for implementing modern slavery compliance to the appropriate teams.

3.2 Individuals on our payroll and agency workers

Individuals on our payroll and agency workers are responsible for:

- Completing assigned mandatory training in the required timeframe (individuals on our payroll)
- Promptly reporting concerns about modern slavery in any aspect of our operations or supply chains, usually to their performance managers or main 6point6 contacts. For more information about reporting methods, see [Raising Concerns](#).

3.3 Performance managers

Performance managers are responsible for:

- Checking that their teams complete mandatory training
- Promptly escalating concerns received about modern slavery to the LT
- Promptly reporting breaches of the policy

3.4 Individuals and companies who do business with us

Individuals and companies who do business with us are responsible for reporting concerns about modern slavery in any aspect of our operations or supply chains, usually to their main 6point6 contacts. For more information about reporting methods, see [Raising Concerns](#).

4. Preventing modern slavery in our workforce

We are committed to paying our employees fairly. We use industry benchmarking to determine competitive pay scales and review them annually. Providing fair and competitive compensation correlates with a lower risk of modern slavery.

Due to the nature of our work, potential employees must undergo vetting to at least [Baseline Personnel Security Standard](#) (BPSS), and, in many cases, to [Security Check](#) (SC) level or higher. For existing employees, we conduct several employment checks periodically – for example, [Disclosure and Barring Service](#) (DBS) checks – and renew security clearances as required. This rigorous vetting guards against instances of modern slavery among our direct workforce.

Our chief operating officer (COO) is responsible for verifying that contractors whom we engage have appropriate security clearance to work on our projects.

5. Assessing and monitoring our supply chains

To mitigate risks of modern slavery in our supply chain, we start by seeking reputable suppliers. Many of these suppliers will have well-defined policies to prevent modern slavery.

We also use Risk Ledger, an industry-recognised, third-party risk management tool to onboard and regularly review our suppliers, including contractors who work through a business. The onboarding process includes specific questions about modern slavery. We analyse the results and investigate any concerns.

If we find instances of modern slavery in a potential supplier, we won't engage them until they demonstrate that they have completely resolved the issue and have implemented verifiable controls to ensure it doesn't reoccur. We may terminate our relationship with an existing supplier if we find they have an unresolved issue with modern slavery or have breached this policy.

6. Raising Concerns

Employees can report a concern about modern slavery to their performance managers; suppliers and other external staff can talk to their main 6point6 contacts. If you don't feel comfortable discussing the situation with your performance manager or main contact, refer to our [Whistleblowing policy](#) for other options.

We encourage openness and will support those who raise genuine concerns under this policy, even if the concern turns out to be mistaken. No-one will suffer any detrimental treatment (such as dismissal, disciplinary action or threats) because of raising a genuine concern.

7. Training

We assign training about modern slavery to people on our payroll when they join the company, and they must complete this training to pass probation. We also include a refresher course in our annual compliance training, which all staff must complete. Completion of annual compliance training is a consideration in everyone's annual performance review.

8. Monitoring company performance and progress

In our [Modern Slavery Statement](#), we identify key performance indicators (KPIs) that we use to monitor performance and progress on the ways we guard against modern slavery. Designated LT members are responsible for gathering the data and presenting it each quarter at an identified LT meeting.

9. Breach of this policy

Employees who breach this policy may face disciplinary action. People we do business with who are not employed by 6point6 may be subject to termination of their relationship with us.

10. Contact information

For more information on this policy, contact enquiries@6point6.co.uk.