



STATS GROUP
Managing Pressure, Minimising Risk

Modern Slavery Policy



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1 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 STATS Group 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 as given in the Act.

2 Scope

STATS Group has a zero-tolerance approach to modern slavery.

STATS Group is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery does not occur in its business or organisations interacting with STATS Group.

3 Responsibility

The Directors at STATS Group are responsible for the implementation of this policy.

4 Steps for Prevention

STATS Group is committed to ensuring transparency in its business and in its approach to tackling modern slavery throughout the supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. STATS Group expects the same standard to be adopted by its contractors, suppliers and the suppliers of STATS suppliers.

Notwithstanding the statutory obligations on STATS Group in relation to modern slavery, it i acknowledged STATS Group does not control the conduct of individuals and organisations in the company’s supply chain. To underpin our compliance with practical steps, STATS Group intends to implement the following measures:

- a) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery;
- b) engage with suppliers regarding modern slavery to understand the measures taken to ensure modern slavery is not occurring in their businesses and their supply chain;
- c) introduce supplier pre-screening and self-reporting for suppliers on safeguarding controls;
- d) introduce contractual provisions for suppliers to confirm adherence to this policy and acceptance of the company’s right to audit.



5 Modern Slavery Statement

- STATS Group is committed to opposing and preventing modern slavery in all its forms Our attitude to modern slavery is zero tolerance.
- The company has reviewed its existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine to what extent protection measures already exist, and what further measures may be required in any part of our business or in our supply chain.
- STATS Group supports and respects the protection of human rights within its sphere of influence and, in particular, the effective elimination of compulsory labour and child labour.
- The company's Code of Business Conduct governs all STATS business dealings and the conduct of all persons or organisations with whom it contracts directly or who is appointed to act on its behalf.
- STATS Group is committed to communicating this policy regularly and encouraging employees to report any concerns relating to compliance with the policy to their line manager, the Director of QHSE and HR or any member of the company's Business Ethics Committee.

Signed
Leigh Howarth
Chief Executive

Date 2/12/19



6 References

Reference	Title	Storage location
IMS-GRP-POL-004	Whistle Blowing Policy	IMS
IMS-GRP-POL-007	Child Labour Policy	IMS