

# Modern Slavery Statement and Policy

This statement is made on behalf of Somax limited with regards to the Modern Slavery Act 2015 which requires employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

This statement and policy is to be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015.

## **Policy and Statement**

Somax is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act. We are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships ant to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Due diligence processes for slavery and human trafficking

Somax is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and this is inferred through their agreement to follow Somax policies. We will expect our suppliers to hold their own suppliers to the same high standards. All employees and persons employed within Somax are asked to familiarise themselves with Somax policies at the start of their employment or association, and are contractually obligated to adhere to Somax policies.

We are satisfied from our own due diligence measures that there is no evidence of any act of modern day slavery or human trafficking within our own organisation.

Somax will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking.

Somax has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.

The vast majority of Somax sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.

The steps we will take to further the goals of the Modern Slavery Act 2015 are:

- Conducting risk assessments to determine which parts of Somax and its suppliers are most at risk of modern slavery so that efforts can be focussed on those areas
- Engaging with our suppliers to convey to them Somax's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses
- Seek to introduce additional pre-screening measures for suppliers



### **Responsibility for the policy**

Ultimate responsibility for the prevention and prevention of modern slavery within Somax rests with Somax's leadership team. Somax has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.

#### Reporting modern slavery within Somax or its suppliers

Somax's whistleblowing and safeguarding policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with Somax or its suppliers may be reported by employees in this manner. The aforementioned policies apply to employees and may be found on SharePoint.

To surmise, any suspected instance of modern slavery or human trafficking Somax or its suppliers must be reported to one of Somax's designated Safeguarding Officers, who will investigate and advise the appropriate people of any further actions.

#### Review

The Modern Slavery Statement and Policy will be reviewed yearly by the College's corporate management team in accordance with clause 6 of the Modern Slavery