

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

### **Policy statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. Tri-Capital Housing have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the 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 as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third- party representatives and business partners.

### **Responsibility for the policy**

The Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Those with purchasing responsibilities have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line managers 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 in supply chains.

### **Compliance with the policy**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it to another member of the management team as soon as possible.

### **How staff and contractors can spot the signs of modern slavery**

Abuse of individuals is not always clear cut. Someone could choose to work for less than the minimum wage, or in an unsafe condition, and not necessarily be forced or deceived.

Signs of slavery are often hidden, making it even harder to recognise victims. Some are more apparent, for example:

- A tenant's home taken over against the tenant's will by drug dealers to use as a base from which to supply drugs
- Persons forced into prostitution and controlled
- Enforced production or growing of drugs such as cannabis.
- Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time, minimal privacy and joint surrender in favour of a sole tenancy
- Often sleeping where they work.

Some common signs which can be identifiers of slavery

- **Physical Appearance:** Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn
- **Isolation:** Victims may rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work
- **Poor living conditions:** Victims may be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address, locks on internal doors together with lots of mattresses present in the property
- **Few or no personal effects:** Victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work
- **Restricted Freedom of Movement:** Victims have little opportunity to move freely and may have had their travel documents retained, e.g. passports
- **Unusual Travel Times:** Victims may be dropped off/collected for work on a regular basis either very early or late at night
- **Reluctance to seek help:** Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

All contractors are provided with TCH Properties Safeguarding Policy and, where appropriate, training is also provided to contractors. The policy has a clear reporting mechanism for all staff/contractors to ensure that if any concerns are noticed, they will be actioned.

### **Communication and awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

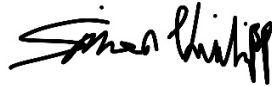
### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **This policy has been approved & authorised by:**

**Name:** Simon Philipp  
**Position:** Director  
**Date:** 23<sup>rd</sup> September 2020  
**Signature:**

A handwritten signature in black ink, appearing to read 'Simon Philipp', written over a horizontal line.