

# MODERN SLAVERY POLICY



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**Next Review:** June 2023

## Introduction

This Policy sets out Chiltern Connections Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the engineering sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

The Board of Directors is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational Scope

**This policy covers the activities of Chiltern Connections Ltd:**

Chiltern Connections Ltd is a family-owned business that operates within the Electronics and Engineering Industries. Chiltern Connections Ltd main business activities include conformal coating services, mechanical engineering, and distributing chemicals to the Electronics, Automotive, Aerospace, Defence and LED markets.

Chiltern Connections Ltd provide their services for clients in the United Kingdom and internationally. Chiltern Connections Ltd employs circa of 30 people. To find out more about the nature of the business please go to [www.chilternconnections.co.uk](http://www.chilternconnections.co.uk)

In order to undertake its operations, the Company works with a range of suppliers including subcontractors and suppliers.

The Company expectations and standards are communicated through the supply chain to set the standard of operation. It is the Company's ethos to build strong relationships with the supply chain to understand their policies and compliance and assess the potential risks. The Company's supplier approval process incorporates a review of controls undertaken by the supplier to assess compliance.

**Responsibility for our anti-slavery initiatives is as follows:**

**Policies:** The HR Department will plan and review policies on an annual basis in accordance with the Quality Department. Key Stakeholders have been involved in the development of policies including the Managing Director, Technical Director and Finance Director. The Quality department ensures governance and compliance.

**Risk Assessments:** The Head of Quality Compliance and Finance Director have undertaken risk analysis on the supply chain, categorising suppliers as high / medium or low risk and implemented

necessary action planning. All new suppliers to the Company must undergo a compliance exercise through our supplier questionnaire prior to any engagement.

**Training:** The Company has undertaken on-line learning to raise awareness of modern slavery. It is the responsibility of all management to ensure that staff have awareness.

## Policies

As part of the Company's commitment to addressing and opposing modern slavery there is a range of policies to identify modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

**No Blame and Whistleblowing Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or those of its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

**Employee code of conduct:** The application of this policy provides clarity for employees regarding the behaviours that are expected of them and the actions that need to be taken when representing the Company. The Company expects employees to act with ethical understanding when interacting with the supply chain and operating overseas.

**Supplier/Procurement code of conduct:** The Company is committed to working with suppliers to ensure the Company's standards are mirrored throughout the supply chain. Suppliers are required to provide evidence that they act ethically, provide a safe working environment.

**Recruitment/Agency Workers Policy:** The Company uses only agencies that are on the preferred supplier list to source labour and always confirms the working practices of any new agency it intends to use before accepting workers from that agency.

**Ethical Business Policy:** The Company is committed to maintaining the highest standards of ethics and integrity and to conducting its business legally, honestly and fairly and requires all its employees to carry out their duties in accordance with these principles.

Our suppliers are made aware of the Policies and are required to adhere to the same standards.

## Due Diligence

As part of the Company's due diligence processes our supplier approval process is being developed to incorporate the following:

- Undertaking risk analysis on the supply chain to assess product or geographical risks of modern slavery and human trafficking.
- Assessing each new supplier for risk in accordance with this policy.
- Conducting supplier audits and assessments to ensure compliance with the Company's commitment to prevent modern slavery and human trafficking.

- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to report on how they intend to address the practices.
- The procedures the Company is adopting have been designed to:
- Understand where there could be risk in the Company and the supply chain.
- Assess and review any risk in the Company and supply chain.
- Mitigate the risk of slavery and human trafficking.
- Give employees an avenue to raise concerns without the fear of reprisal.

## Risk and Compliance

The Company assesses whether or not particular activities or countries are a high risk in relation to slavery or human trafficking by researching and assessing:

- The country in which the business operates specifically in countries where human rights are limited
- In geographical regions in which the business operates where labour practices can be poor for migrant workers
- Supplier partnership risks

## High-risk Activities

The Company has identified that supply of goods sourced from outside of the UK pose a high risk. To mitigate this the Company will check supply chains to ensure the potential for slavery and human trafficking is significantly reduced. The Company informs suppliers that we intend to engage with, that the Company is not prepared to accept any form of exploitation.

## Performance Indicators

The Company will instigate the following measures to monitor performance:

- Requiring all staff to have completed training on modern slavery.
- Developing the system for supply chain verification whereby the company evaluates potential suppliers before they enter the supply chain.
- Reviewing its existing supply chains, whereby the Company will evaluate all existing suppliers.

## Training

The Company is committed to educating staff to recognise modern slavery and human trafficking in the Company and supply chains. The training programs will raise awareness, help to identify risk and encourage employees to report any breaches of this policy.

The Company's modern slavery training will cover:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;

- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- The Company's purchasing processes in relation to the supply chain conditions.
- What external help is available through initiatives such as 'stronger together'.