

ONE WAY
ANTI-SLAVERY POLICY
VERSION: OCTOBER 2023



Anti-Slavery Policy

One Way are committed to legal compliance, ethical standards and the fundamental human rights, as set out by the principles of the International Labour Standards / United Nations Guiding Principles.

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.

We 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 our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all 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.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy

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

The managers 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.

Management 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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the board of Directors.

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 must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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 as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and awareness of this policy

Training of 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 in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Due diligence processes

One Way shall:

- Address and directly prohibit practices that are known to contribute to the risk of modern slavery;
- Operate strict procurement processes, ensuring suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act;
- Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers;
- Have completed an analysis of assurance information from existing suppliers and partners and followed up where relevant;
- We shall follow advice and guidance in relation to the Modern Slavery Act set out by the government;
- Provide appropriate training and instruction to our personnel in respect of the Modern Slavery Act to our workforce;
- Have added a specific item relating to the Modern Slavery Act to the agenda of the contract management meetings with suppliers enabling us to be kept informed of any changes;
- Include appropriate terms in our contractual documentation, obliging suppliers and contractors to comply with the Modern Slavery Act and reserving the right for us to audit suppliers and contractors, where we consider it appropriate;
- Encourage staff to identify and report any potential breaches of our anti-slavery policy statement;
- Encourage staff to whistle blow and report any concerns and issues directly to the Managing Director, who is responsible for preventing modern slavery within our business,
- Whistle blowers are protected through our confidential reporting process;
- Take all necessary steps should modern slavery practices be identified within either our business or our supply chain;

The above processes are designed to:

- Identify and assess management requirements and any potential high-risk areas within our business and supply chains, including materials/labour sourcing,
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains,
- Provide adequate protection for whistle blowers.

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.



Signed:
Paul Payne, Managing Director

Date: 12th October 2021

Last Reviewed: 2nd October 2023
Next Review by: 1st October 2024