

BUSINESS MANUAL



Anti-slavery and human trafficking policy

No: BM-AS001

CIRCULATION LIST

This Anti-slavery and human trafficking policy is a controlled document and is maintained on the server as read only. The HR Representative must ensure that all amendments are circulated, and obsolete copies removed and filed. Hard copies used for training and internal auditing are controlled and distributed as follows.

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Holder

1

Kenneth B. Mc Cleft

AMENDMENT HISTORY

This document is reviewed periodically, at least annually, and is retained for a period of 5 Years. Amendments and revisions are distributed to the named holders. The history of amendments and the issue of revisions are recorded below.

Date	Amend. No.	Page No.	New Issue No.	Reason for Change	Authorised by
07/11/2018	-	All	1	Initial release.	J Dowbiggin
05/01/2021	1		2	Name Change	J Dowbiggin
05/01/2022	2		3	Annual Review	K Mc Cleft
09/01/2023	3		4	Annual Review	K Mc Cleft
11/03/2024	4		5	Annual Review	K. Mc Cleft
01/10/2025	5		6	Annual Review	K. Mc Cleft
	6		7		
	7		8		
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Copies of this document other than those listed above will not be revised; such copies will be marked as **UNCONTROLLED**.

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Anti-slavery and human trafficking policy

2. Policy Statement

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, agents, contractors and suppliers.

X.Communications Limited strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

3. Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:

- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships

4. Associated Documents and Records

Document / Record Name	Storage Location	Owner	Protection Control	Retention Schedule
BM-AS001 Anti-slavery and human trafficking policy	SharePoint / OneDrive	K McCleaff	Controlled: Password Protected Access	5 Years

5. Document Management

This document is valid as of 01/10/2025.

This document is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria.

- Legislative requirements defined by law, where appropriate



J Dowbiggin
Managing Director

