

Anti-Slavery and Human Trafficking Policy

Purpose:

This policy outlines Net Gain Solutions commitment to preventing modern slavery and human trafficking in its business operations and supply chains, ensuring compliance with the Modern Slavery Act 2015.

Scope:

This policy applies to all employees, subcontractors, and suppliers engaged in any capacity with any entity within the Net Gain Solutions group.

Policy Statement:

The Net Gain Solutions group has zero tolerance for slavery, servitude, forced or compulsory labour, and human trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings.

1. Risk Assessment and Due Diligence:

- Regularly review our supply chain to identify and mitigate risks of modern slavery.
- Vet all suppliers and subcontractors to ensure they meet ethical labour standards.
- Require declarations of compliance with the Modern Slavery Act 2015 from all suppliers and subcontractors.

2. Training and Awareness:

- Provide training for employees to recognize signs of modern slavery and human trafficking.
- Ensure all employees and subcontractors understand this policy and their responsibilities.

3. Reporting Mechanisms:

- Encourage employees, subcontractors, and suppliers to report any concerns or suspicions regarding modern slavery via our confidential whistleblowing mechanism.
- Investigate all reports promptly and take appropriate action, including reporting to relevant authorities.
 - **Modern Slavery Helpline:** Call 08000 121 700 or visit [modernslaveryhelpline.org](https://www.modernslaveryhelpline.org) to report concerns confidentially and receive advice.
 - **Gangmasters and Labour Abuse Authority (GLAA):** www.gla.gov.uk or call on 0800 432 0804
 - **National Crime Agency:** [National Crime Agency](https://www.nca.gov.uk)
 - **Local Police:** Dial 101 for non-emergencies or 999 if someone is in immediate danger

4. Supplier and Subcontractor Obligations:

- Require all subcontractors and suppliers to adhere to this policy.
- Include anti-slavery clauses in contracts to ensure compliance.

5. Continuous Improvement:

- Periodically review this policy to ensure it remains relevant and effective.
 - Collaborate with industry peers to share best practices and improve standards.
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Responsibilities:

The senior management team is responsible for ensuring compliance with this policy.

All employees and subcontractors are required to read, understand, and adhere to the policy.

Monitoring and Review:

This policy will be reviewed annually or when significant changes occur in relevant legislation or the company's operations.

For further information or to report concerns, contact Ricardo Gutierrez-Inostroza at ricardo@legacyhb.co.uk.