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## **MODERN SLAVERY STATEMENT**

Our Modern Slavery Statement represents what we do to prevent modern slavery taking place in our business and supply chains

The presence of Slavery and forced labor runs like a thread in the operations and supply chains of many businesses internationally and this poses a huge problem that organizations strive to resolve because of its subtlety. As an organization, we advocate for the Modern Slavery Act 2015 (as enunciated in Section 54) to require businesses to be transparent on what they are doing to address slavery because we believe that an organization should not put profit above the welfare and well-being of its staff or employees as it is important that all businesses consider whether they may be contributing to such abuses and take appropriate action

This guidance provides ideas on our idiosyncrasies about slavery as an organization and how we can respond effectively and link actions to address slavery. We understand the gravity of slavery and see this requirement as an opportunity for us to express our views, as well as for the development of collective approaches within sectors to prevent slavery occurring in supply chains.

## **OBJECTIVES**

Welkingreen Limited expressly forbids any forced, bonded, indentured, involuntary prison labor, slavery or trafficking of persons. Recognizing the particular vulnerability of foreign migrant workers to exploitative labor practices and risks of forced labor, this policy sets out the minimum requirements for the recruitment, selection, hiring and management of foreign migrant workers by or on behalf of suppliers doing business with us.

The objective of this organization is to set forth the minimum requirements for the appropriate and ethical recruitment and management of workers.

Suppliers must also comply with all applicable national and local labor laws and where the national or local laws and/or guidelines have requirements in the same area, suppliers shall meet the more stringent requirements.

All work shall be voluntary and foreign migrant workers shall be free to terminate their employment with a supplier upon reasonable notice without penalty.

Suppliers shall maintain adequate controls to ensure that workers have not been charged recruitment or placement fees during their recruitment process.

There shall be no fraud, deception, or coercion in the recruitment, placement, transportation or management of foreign migrant workers.



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Suppliers and their recruitment agents shall be transparent at all times with foreign migrant workers about all aspects of employment terms and conditions. All foreign migrant workers must be employed and paid directly by the supplier, not by agents, sub-agents, or third parties. All foreign migrant workers must be provided a written employment contract, in the language that they can understand both orally and in writing.

Neither suppliers, recruitment agents nor any other third parties shall hold original foreign migrant worker identification documents, passports, travel papers or other personal documents, unless required by law.

Suppliers shall establish appropriate due diligence and monitoring programs to screen and manage any recruitment agents used to select, recruit and/or transport foreign migrant workers.

Suppliers shall also establish systems to oversee the training and management of foreign migrant workers on equal terms with local workers, consistent with local laws.

## **ADDRESSING THE RISKS**

As the section on understanding the risks of modern slavery highlights, identifying effective actions requires careful thought about how we impacts our employees and business partners. By taking the issue seriously and addressing modern slavery as one part of the organization's overall approach to human rights due diligence, senior managers have the chance to strengthen and improve their quality control procedures and at the same time, to fulfill their responsibilities by undergoing trainings.

## **OUR COMMITMENT**

- (a) To meet the responsibility to respect human rights;
- (b) A human rights due diligence process to identify, prevent, mitigate and account for how we address the impacts of modern slavery on human rights;
- (c) Processes to enable the remediation of any adverse human rights impacts caused;
- (d) To imbibe policies in relation to slavery and human trafficking in our operations and supply chains.

## **IMPLEMENTATION**

Paragraph 5 of Section 54 of the Modern Slavery Act 2015 sets out that a company's slavery and human trafficking statement may include information about 'its policies in relation to slavery and human trafficking'. The section below aims to give guidance on how we as an organization deal with slavery at different stages.



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Good practice in this regard would include:

Mapping existing policies and codes of conduct to identify coverage of risks related to modern slavery and specific measures to prevent or address modern slavery should be included in all relevant policies as follows:

- Procurement policy
- Whistle-blowing procedures
- Migrant labor policies
- Supplier code of conduct
- Recruitment policy
- Employee code of conduct
- Policies concerning access to remedy, compensation and justice for victims of modern slavery
- Staff training/awareness-raising policies