

## **MODERN DAY SLAVERY POLICY**

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that Substance Qi have taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Substance Qi has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain

### **1. Our policy on slavery and human trafficking**

Substance Qi is aware of our responsibilities towards employees and expect all suppliers to adhere to the same ethical principles. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed employees
- Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities where necessary
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or

people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals

- Standards of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act

Our approach to procurement and our supply chain includes:

- Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes

## **2. Training**

Advice and training about modern slavery and human trafficking is available to employees either through training programmes, safeguarding policies and / or ongoing procedures

## **3. Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our employees, clients, suppliers, or law enforcement agencies to indicate that modern slavery practices have been identified

**5<sup>TH</sup> November 2021**