

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

We are committed to providing a safe, healthy, and productive working environment for all team members, suppliers, customers, and visitors. This includes ensuring all team members are offered equal opportunities, are respected as well as being treated kindly and fairly at work, please see our Inclusion Policy.

This Policy is published in line with section 54(1) of the Modern Slavery Act 2015 and is in place to protect our team and team working within our supply chain. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or 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.

What is covered?

We have a moral and legal responsibility to ensure that there is no modern slavery, human trafficking, or unlawful child labour in any part of our business or supply chain. Our values reflect our commitment to acting ethically and with integrity in all our business relationships. Our Anti-bribery and Anti-corruption, Bullying and Harassment, Whistleblowing, and Inclusion policies link with being an equal opportunities employer and are key to this policy.

We currently operate in the UK only (England and Scotland) as a residential and holiday park operator and our supply chain operates in the following countries:

- England
- Scotland
- Wales
- Ireland
- Europe

We consider some of the products purchased to sell in our retail outlets maybe high-risk as they are purchased through a third party.

Who is the policy for?

This policy applies to all team members, suppliers, contractors, agencies, and other business partners. This policy does not form part of our terms and conditions of employment, and we reserve the right to amend this policy at any time. We reserve the right to adapt and amend the procedure according to the circumstances in each case. Although this policy does not apply to customers anyone found to be involved in modern slavery and human trafficking will be asked to leave our premises immediately and dealt with confidentially by the relevant Leader.

Responsibility for this Policy

Responsibility for our modern slavery initiative is as follows:

- Policy – managed by Head of Procurement and Head of Human Resources
- Risk Assessments – Supply Chain assessments will be carried out by Head of Procurement
- Investigations and Due Diligence – each manager will be responsible for investigating any reported incidents and if substantiated report to Head of Procurement and/or Head of Human Resources depending on the issue
- Training will be given to those involved in the supply chain and all team will be advised and kept up to date on our statement and policy.

Compliance with the Policy

We undertake due diligence when considering any new suppliers and regularly review existing suppliers, and our due diligence concentrates on the high-risk countries.

We are creating an annual risk profile for each supplier and taking steps to improve the recording of supplier practices and participating in collaborative initiatives as and when necessary. We will commence to use an ethical supplier database and will invoke sanctions against suppliers that fail to maintain or improve their performance in line with initiatives agreed.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control.

Modern Slavery and Human Trafficking Statement 2022

Here are the steps that Cove Communities UK has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

Our commitment to the principles of the Modern Slavery Act 2015

Cove Communities UK is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful environment for our team, please see our Inclusion Policy. We want all team to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management practices are designed to ensure that all prospective team members are legally entitled to work in the UK and to safeguard team from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our supply chain

Due to the nature of our business, we assess ourselves to have a medium risk of modern slavery in our business and supply chains. Our supply chains are limited, and we procure goods and services from a range of UK and overseas suppliers, mainly through UK government frameworks.

Other policies related to Modern Slavery Act 2015

The following details are available in the team handbook and on the team hub for all team Whistleblowing, Anti-Bribery and Anti-Corruption Policy and Bullying and Harassment Policy and Inclusion Policy

Communication and Awareness

The Statement will appear on our website as well as be available on our team hub for all team to read, understand and comply with. We will commit to train all our leaders in the basic principles of the Modern Slavery Act 2015 and the procedure in place should an issue arise internally or with a supplier. A zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any team member 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 the policy.

Confidentiality

In order to enable team members to feel confident in raising their concerns of slavery, servitude, or forced or compulsory labour it is imperative that Managers and team members involved keep the information confidential throughout the process. Only those team members who need to know about the situation will be involved and it is the responsibility of anyone involved to respect the high level of confidentiality that is required. Breach of any confidentiality may give rise to disciplinary action.

Record keeping

Records will be kept of the suppliers, products sourced from high-risk countries. The agreed course of action and the outcome and these records are confidential and will be processed in accordance with our Data Protection Policy.

If you have any questions

If you have any questions regarding this policy, please speak to your Manager or Human Resources.