

Anti-Slavery & Human Trafficking Policy

Respecting and Upholding Human Rights

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1. Document Overview

Purpose	To provide a clear commitment to provide services to customers, employment to staff and through 3rd party suppliers that does not exploit or erode anyone's human rights		
Audience	All colleagues directly employed by Thrive		
Data Classification	Public		
Review Cycle	24 months		
Last Review	Feb 25	Next Review	Feb 27
Relevant Legislation	Modern Slavery Act 2015		

2. Document Version History

Version	Date	Author	Reviewer	Changes & Additions
V1.0	18/01/21	KFJ	Leadership Team & Rem & Gov Committee	New Policy
V2.0	09/12/22	EMu	Business Performance Group	Policy review
V3.0	21/01/25	ES	CCG Committee Pride & Place	Policy Review

3. Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. Thrive is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Thrive is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with the disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We ask our colleagues to be vigilant and look out for any signs of modern slavery when working or visiting our customers in their homes.

4. Scope

The Anti-Slavery & Human Trafficking Policy applies to all colleagues employed on Thrive terms and conditions and its subsidiary business, agency staff, and contractors. This policy does not form part of the contract of employment and Thrive reserves the right to amend or withdraw this policy at any time.

5. Taking Responsibility

The Thrive Board holds ultimate responsibility for ensuring that this policy aligns with our legal and ethical obligations, and that all individuals under our supervision adhere to it.

The Leadership Management Team is responsible for implementing this policy, monitoring its effectiveness, addressing queries, and auditing internal controls to combat modern slavery.

Management at all levels is responsible for ensuring that those reporting to them understand and comply with this policy. They must also provide adequate and regular training on this policy and the issue of modern slavery in the supply chain.

6. Supply Chain Management

Thrive are committed to ensuring that our suppliers and contractors adhere to the same high standards and conduct due diligence on their supply chain to evaluate and address risks related to modern slavery and human trafficking.

7. What to look out for

It's everyone's responsibility to look out for the signs of exploitation. Concerns can arise through our own observations or through our customers reporting concerns about others in the communities we operate. Thrive's Safeguarding Policy, sets out the process we are to follow to alert the appropriate authority to potential criminal/exploitative behaviour.

Thrive colleagues should carefully consider instances when tender prices seem unusually low compared to other bidders. This could suggest that those working for the contractor may be underpaid. Additional concerns might arise if contractors have a transient workforce, which could imply poor employment terms or possible trafficking issues, or if the physical appearance of workers seems unkempt, malnourished, or shows signs of injuries or other forms of distress. While these examples do not always indicate exploitation, it is important to assess and confirm that this is not the case.

The People & Culture Team will ensure as part of the onboarding process that anyone joining Thrive can provide the documentation necessary to prove they have the right to work in UK. Furthermore, the team will guarantee that our working arrangements are fully compliant with current UK legislation and best practices, including The Working Time Regulations and National Living and Minimum Wage standards.

8. What to do if you have a concern

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of us all. Colleagues are expected to avoid any activity that might lead to, or suggest, a breach of this policy.

Should you believe or suspect that a conflict with this policy has or will take place, you must act by contacting any member of the Governance Team or your line manager as soon as possible.

Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Thrives business or supply chain of any supplier tier at the earliest possible stage.

If colleagues are uncertain about whether a specific action, the general treatment of workers, or the working conditions within any tier of our supply chains constitute any forms of modern slavery, they should discuss it with their line manager or contact the Governance Team.

Thrive will support individuals who raise genuine concerns in good faith under this policy, even if the concerns are ultimately found to be unfounded. We are dedicated to preventing any adverse treatment of those reporting in good faith their suspicion that modern slavery may be occurring within our business or supply chain.

9. Breaches of this policy

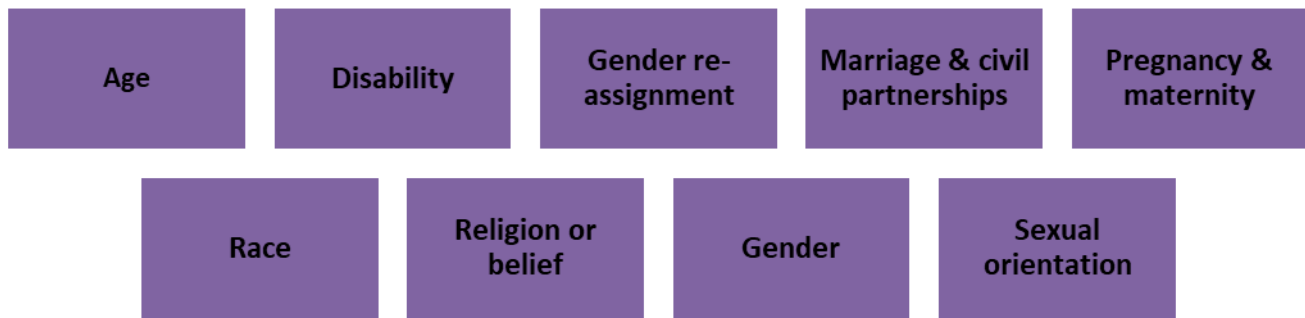
We want to feel proud of everything we do ourselves and through our suppliers, therefore the consequence of breaching this policy has the potential to be severe and any colleague who violates this policy may face disciplinary action which may result in dismissal for misconduct. Thrive may also terminate relationships with individuals and/or organisations working on our behalf if they breach Thrives expectations in this area.

10. Thrives Core Behaviours

Tuned-in	I will be aware and consider how people are treated when interacting with suppliers
Curious	If something doesn't feel right, I will ask questions to get to the bottom of it.
Smart, Can do	I will ensure that a thorough due diligence process is conducted prior to engaging with new suppliers
Ownership	I will promptly report anything that seems wrong
Pride	I will protect Thrive's reputation

11. Treating Everyone with Respect

This policy has been impact assessed in line with Thrive Homes' obligation to comply with the Equality Act (2010). We aim to design inclusive services, policies and behave in a way that does not discriminate on the grounds of:



While we are not required by law, we seek to ensure we do not discriminate on any basis that is rooted in prejudice, for example we are not influenced by:



Every effort will be made to ensure that decisions made reflect this commitment.

12. Other Related Policies and Guidance

This policy links to other policies Thrive has in place, including but not limited to:

- Whistleblowing Policy
- Professional Conduct & Probity Policy
- EDI Statement of Intent
- Disciplinary Policy
- Recruitment & Selection Policy
- Onboarding Policy
- Dignity at work Policy
- Procurement & Contract Management Policy
- Safeguarding Policy

As a business we try hard to keep all these related policies aligned with each other. Anyone spotting inconsistency or contradictory statements, is asked to contact the Author and make concerns known. Supporting us to keep information clear and consistent will always be welcomed.

13. Policy Approval

As this policy is a core component of how Thrive manages its business the document will be evaluated by the Risk & Audit Forum, Business Resilience Working Group and Risk & Audit Committee part of any review.

14. Support and Further Guidance

This policy has been drafted with input from colleagues across Thrive. Any concerns on how to interpret or follow its requirements, can be raised with members of the People & Culture, Governance, Finance or Procurement Teams.

Colleagues, Board Members and third parties have a responsibility to work in a way that's consistent with the expectations set out in the policy and its implied intent. Should anyone witness or become aware of activities that undermine or conflict with the intention of this policy please alert a member of the Finance or Governance Team, or any member of the leadership team as soon as possible.