

## Policies and Procedures

### 6050 Slavery and Human Trafficking Policy Statement

Responsible: Eric Prescott

Effective Date: 30 November 2016

Revision 1

---

#### Definition and Purpose

The company falls within the compliance regime of the Modern Slavery Act 2015 by virtue of its size and Paula Rosa Manhattan is determined to operate ethically and with integrity and in compliance with this legislation.

The company provides this statement to describe the existing policies and structure that contribute to the prevention of potential abuses of slavery and human trafficking and in compliance with the requirements of the Modern Slavery Act 2015.

#### Statement

The business was started in 1948 and operates within the contract kitchen market in the United Kingdom. The business has a production location in Lancing, West Sussex but operates across the whole of the mainland UK supplying kitchens to the new build market.

#### Code of Conduct

All employees and suppliers must positively affirm the Ballingslöv International AB Group Code of Conduct declaration on an annual basis. This code is built from the requirements of various international conventions including the UN Universal Declaration of Human Rights, the UN Convention on Rights of the Child and the UN Global Compact. Corporate integrity is highly valued within the group and its partners are expected to uphold the same requirements on their sub-suppliers. The company actively supports and encourages business partners and employees to achieve these aims.

#### Risk Determination

The business formally reviews business risk exposure on an annual basis and this review shall also consider potential exploitation and exposures to modern slavery and trafficking issues. Areas of the business that are considered susceptible to risk are identified and listed below are the most significant risk areas identified.

<b>Risk Area</b>	<b>Basis of Risk Determination</b>
<ul style="list-style-type: none"><li>• Employment &amp; Staffing</li></ul>	High levels of international labour and temporary resources
<ul style="list-style-type: none"><li>• Supply Chain - Goods</li></ul>	International supply base
<ul style="list-style-type: none"><li>• Supply Chain - Subcontractors</li></ul>	Demanding compliance regime

## **Policies and Procedures**

### Employment & Staffing

The business has stringent HR policies and recruitment practices ensuring compliance with The Modern Slavery Act 2015 and all other relevant employment legislation. Auditing practices are in place for checking that all employees have the right to work in the UK and personal data is consistent with the individual employed. We have the same requirements towards our temporary employment partners and we are continually reviewing our recruitment methods throughout the business to ensure transparency and compliance. Training for those employees who are engaged in recruitment and in sourcing and managing employment and staffing, ensures that Slavery and Human Trafficking are not taking place within the organization.

### Supply Chain

We operate a zero-tolerance policy towards Slavery and Human Trafficking in our supply base. All suppliers are required to provide a statement of conformity to the Code of Conduct and periodic inspections are carried out to ensure compliance. Our Group Head Office is partly responsible for procuring external goods and services, and is dedicated to ensuring that suppliers and providers always adhere to our Code of Conduct and support our compliance to the Modern Slavery Act 2015.

### Supply Chain – Subcontractors & Temporary Staffing

Subcontractors and businesses supplying temporary labour are vetted for compliance with all appropriate registrations and insurances relevant for their roles. A Group Code of Conduct statement is one of these requirements and is updated on an annual basis.

### Training

Any member of staff or temporary member of staff involved or likely to be involved in the procurement of goods and services has been specifically trained in the requirements of The Modern Slavery Act 2015.

### Reporting

If an employee has any concerns regarding a likely risk of, or actual breach of our Policy or the Legislation, this must be raised with the HR Manager.

Reporting can also occur in accordance with the Grievance Policy in general or with the Whistleblowing section of the Grievance Policy in particular.

**Eric Prescott**  
Managing Director

