

# Modern Slavery Act Policy Statement

---



<b>Issue Date:</b>	30/03/2017
<b>Date of Next Review</b>	30/03/2018
<b>Version No:</b>	2.0
<b>Procedure Owner:</b>	Julie Burley
<b>Procedure Author</b>	Sally Mashford
<b>Document Number:</b>	MS001
<b>Site Relevance</b>	ALL SITES/GROUP
<b>Classification</b>	<b>EXTERNAL</b> "Suitable for publishing and sharing within the EDM Group domain and for sharing with selected 3rd parties."
<b>Special Handling:</b>	<b>NONE</b>

## Document History

### Document Location

- The source of the document will be found on the IMS database Wolfps01
- An electronic version is available on the internal intranet and is only valid on the day it is printed.
- Copies may be distributed to interested parties, but will be labelled as uncontrolled
- The control of this document is in accordance with EDM Group's Document Control procedure.

### Revision History

Revision Date	Summary of Changes	Version Number
11/03/2016	Group Org chart updated, document versions updated. Reference to UK business added.	1.3
11/03/2016	Procedure owner/approver changed. Sentence added regarding local legislation. Issue date amended.	1.2
25/03/2016	Draft Version for review	1.1
30/03/2017	Group Org chart updated, document versions updated. Change of approver.	2
dd/mm/yyyy		
dd/mm/yyyy		
dd/mm/yyyy		

This document is EDM Group Copyright, and contains EDM Group intellectual property and information that is commercially sensitive.

EDM Group respectfully request that the content of this document is only used for its intended purpose, and is not shown or passed to any organisation or individual other than the intended recipient(s). In particular, this document must not be shown to individuals or organisations offering competing services or products.

## Approvals

This document has been approved by:

Name	Signature	Title
Harkamal Phagura		UK Director FP&A

## Distribution

Distributed to	Located	Format
Companywide	Noticeboards	Paper
Companywide	Intranet	Electronic (PDF)

### Quality Management



Certificate Number:  
8296321447

### Environmental Management



Certificate Number:  
8296108202

### Information Security Management



Certificate Number:  
8509

### Health & Safety Management



Certificate Number:  
98008296

## Contents

1	Background.....	5
1.1	Modern Slavery Act 2015.....	5
2	EDM's Policy Statement.....	6
2.1	Organisation and Employees .....	6
2.2	Suppliers and Contractors .....	7
3	EDM Supplier Countries.....	8
4	Audit Procedures .....	8
5	Organisational Structure and Group Relationships.....	9

## 1 Background

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude, forced or compulsory labour; and human trafficking.

Definitions:

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Forced or compulsory labour is defined in international law by the coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Human Trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

### 1.1 Modern Slavery Act 2015

The introduction of the Modern Slavery Act 2015 requires EDM Group Ltd to be transparent about what they are doing in respect of the welfare and wellbeing of its employees and those working on its behalf.

By promoting equality throughout the organisation beginning at the point of recruitment and by increasing supply chain accountability, more workers will be protected and consumers will have greater confidence in the goods and services they buy.

The act defines a commercial organisation must prepare a slavery and human trafficking statement for each financial year of the organisation if it supplies goods and services and has a total annual turnover of not less than an amount prescribed by regulations made by the Secretary of State, currently £36m.

## 2 EDM's Policy Statement

The following statement describes the steps EDM Group will take during the current financial year 1<sup>st</sup> April 2017 to 31 March 2018 to ensure that slavery and human trafficking is not taking place and refers specifically to the UK business. To ensure that servitude or forced or compulsory labour is not practised within the business. The statement will reference EDM Group's policies and documents where necessary to support the statement. It outlines EDM Group's recruitment and employment standards, Equal Opportunity policy, Code of Conduct at Work and the Supply Chain approval and review process. EDM Group aims are to provide transparency in this area and are committed to providing a continued annual statement for the financial year.

EDM Group confirm adherence to all local and relevant legislation and regulations and will regularly review the policy statement to ensure continued compliance.

### 2.1 Organisation and Employees

EDM Group is a leading provider in information management and work with the following business sectors; Mortgage Support Services, Automotive, Insurance, Pensions, Healthcare, Financial Services and the Public Sector. EDM provide services such as Records Management, Capture services, Business Process Management, HR Service Desk, Online Document Hosting and Digital Mailroom.

EDM have sites in the UK and USA.

The group organisational structure is shown at Annex 1 and the UK Model at Annex 2 within this document.

"EDM Group invest in people for quality, responsiveness and excellence in service delivery and promote an open and communicative management style to ensure their employees feel part of a team involved and engaged with the organisation. Our standards for employment and recruitment are communicated in the form of various policies and documents. These are available to all employees on the Company Intranet and communicated in a number of ways around the business including notice boards, quarterly communications and forum meetings.

All EDM policies and procedures are reviewed annually or when a significant change occurs.

References:

*EDM Employee Handbook*

*Equality Policy*

*HR Security Guideline Policy*

*Recruitment Policy & Procedure*

EDM have a written policy for raising concerns at work and outline the procedure for making a disclosure. This allows employees to raise a concern in confidence they might have in any area of the business, its standards and compliance.

Reference:

*Whistle Blowing Policy.*

EDM promotes a culture of openness through open communication, honesty and integrity, inclusion, mutual trust and respect, teamwork, constructive positive attitude, a supportive not blaming culture and one where people want to work for EDM.

EDM is committed to the principle of equal opportunity in employment and complies with the Equality Act 2010 with respect to the nine protected characteristics.

Reference:

*Human Resources Policy for Equal Opportunity*

EDM follow a documented Recruitment Policy and Procedure and have strict Security Guidelines in place to support the recruitment process.

EDM have a documented Grievance Procedure for the reporting of unlawful discrimination in any form.

EDM have a Training and Development Policy to ensure the required development of staff through communication and training opportunity. Our Communication Policy outlines EDM's commitment to good communication and information feed throughout the business to all.

EDM's Corporate and Social Responsibility Policy provides clear responsibility regarding expected behaviour and social standards both whilst at work and outside of the work environment.

Reference:

*Training & Development Policy*

*Corporate & Social Responsibility Policy*

*Communications Policy*

## **2.2 Suppliers and Contractors**

EDM have a documented process for the sourcing and approval of third party suppliers to the organisation. EDM hold an Approved Supplier Register which documents all third party suppliers to the business. The supplier review process is completed on a 3 year cycle and follows the same format as initial approval. Supplier service review may take place more regularly.

As part of the process EDM issue a questionnaire for completion by the supplier to confirm their standards and compliance in quality, environmental aspects, health and safety, information security, equal opportunities, recruitment and evidence of business insurance protection.

EDM require supplier and contractor procedures, method statements and systems of work. There are documented contracts held which are also reviewed at regular intervals.

Reference:

*Supplier Code of Conduct*

This Supplier Code of Conduct details EDM's controls and standards in labour and human rights and management practises. Working hours, payment and health and safety are detailed.

Violations of the Supplier Code will result in the termination of the business relationship with a supplier.

### **3 EDM Supplier Countries**

EDM's approved suppliers are predominately based in the UK. Goods and services are sourced for the following business areas and requirements:

Group Security

Facilities

Consumables/stationary

Transport

IT

Waste and Environmental Management

Recruitment

Welfare

### **4 Audit Procedures**

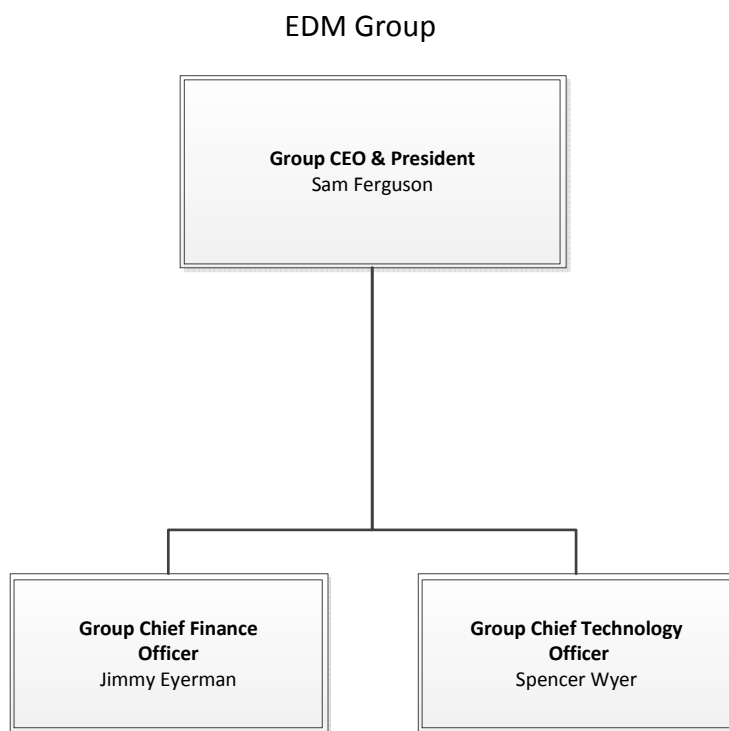
EDM perform supplier audits at regular intervals and business impact analysis to identify risks to the business and ensure continued compliance to EDM's Supplier Code of Conduct and standards for third parties.

This may involve a physical and logical review of a supplier relationship. Policies and procedures from the supplier are reviewed in line with the goods or service provided. This would include off-shore supplier relationships.

EDM are subject to audits from clients and external certifying bodies for quality, environmental, health and safety and information security. EDM are accredited to ISO9001:2008, ISO14001:2004, OHSAS18001:2007 and ISO27001:2013.

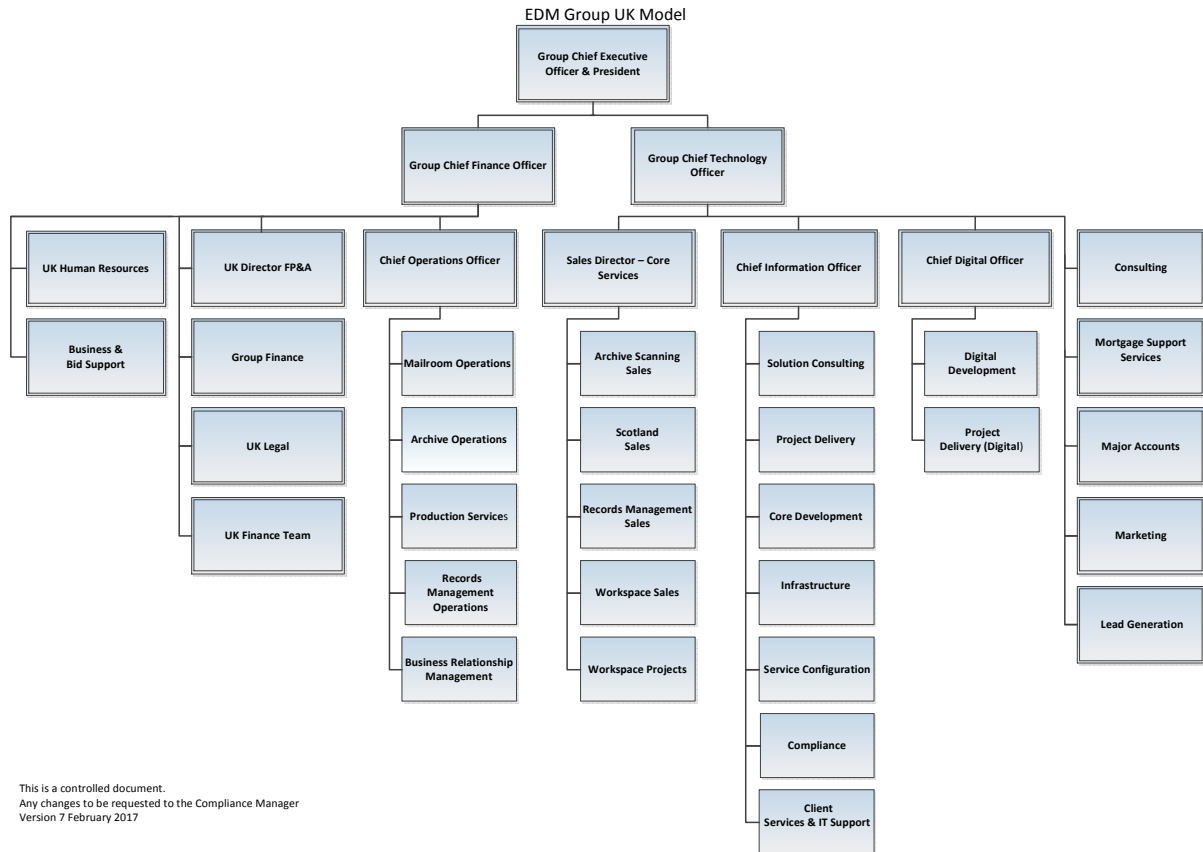
## 5 Organisational Structure and Group Relationships

### GROUP MODEL



### ANNEX 1

UK Model



ANNEX 2