

Company Name:	HornbyChapman Ltd
Model Policy No.	005
Model Policy Name:	Modern Slavery Policy
Date:	1/4/20
Version:	2

1. HornbyChapman is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. HornbyChapman is committed to ensuring that its staff, its Tier 1 Suppliers and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. HornbyChapman only has Tier 1 suppliers. We receive their updated Policies on an annual basis.
4. HornbyChapman provides appropriate training and awareness information for all of its staff. In particular: All of our staff receive awareness-raising information and annual training around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management. The training covers: Abuse of vulnerability, Deception, Restriction of movement, Isolation, Physical and sexual violence, Intimidation and threats, Retention of identity documents, withholding of wages, Debt bondage, Abusive working and living conditions, Excessive overtime
5. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Managing Director. We also have an online Portal for staff to record any suspected breaches.
6. Reports surrounding these issues are taken extremely seriously by our senior leadership team who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.

7. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The percentage of staff who have undergone Policy training
 - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements and Policies.
 - The percentage of candidates supplied from audited businesses / our preferred supplier list,
 - The effectiveness of enforcement against suppliers who breach policies,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
8. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
9. We would also recommend reading this in conjunction with our other policies, including our:
 - Corporate social responsibility policy,
 - Ethical procurement policy,
 - Anti-bribery / corruption policy, and
 - Whistle-blowing policy.

This policy was adopted on 1/4/2020 after being agreed by our Board of Directors and is reviewed annually.