

Modern Slavery and Human Trafficking Policy

Our Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships. To implement and enforce effective systems to contribute to the prevention of slavery and human trafficking both within our business and externally to set an expectation of high standards in working with contractors, suppliers and other business partners.

The purpose of this policy is to raise awareness within Matrix Booking of the issue of modern slavery and how staff can play their part in preventing this form of exploitation whilst protecting our business reputation.

The Modern Slavery Act 2015 covers four defined activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

The Modern Slavery Act 2015 recognises the important part organisations can and should play in tackling slavery. We pay close attention to:

- our supply chain;
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards; and
- cleaning and catering suppliers.

Responsibilities

All Directors, managers, staff and contractors have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Matrix Booking will:

- publish and maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- be clear about our recruitment policies and procedures
- take reasonable steps to check our supply chains (e.g. requiring suppliers to provide us with a suitable Code of Conduct)

- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc.
- ensure we have in place an open and transparent grievance process for all staff
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

Staff can participate in the prevention of slavery and exploitation by adhering to the following guidelines. Managers and Directors undertake to listen carefully to any concerns and to take appropriate and reasonable actions.

- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services then please report it
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill- treated
- tell us if you think there is more we can do to prevent people from being exploited

Positive Working Environment

Matrix Booking is committed to providing employees with a safe, healthy and supportive environment at work. Alongside contractual terms we have a range of policies to create a supporting workplace culture. As examples of these Matrix Booking offers:

- Flexible working, appraisals and career development opportunities
- Social events/activities to encourage positive relationships within the workplace
- Trained mental health first aiders, first aiders and fire wardens

The Risks

- The principal areas of risk we face, related to slavery and human trafficking, include:
 - supply chains
 - general recruitment
- We manage these risk areas through our procedures set out in this policy and elsewhere.

Managing our risks

- Good practice
 - Examine internal business procedures to avoid making demands of suppliers or subcontractors that might lead them to violate human rights, including children's rights. These types of demands include insufficient or late payments, and late orders or high- pressure deadlines resulting from poor demand forecasting.

- Ensure that zero tolerance for modern slavery and respect for human rights, including children's rights, are built into contracts and represented in dialogue, self-assessment, audits, training and capacity- building opportunities for suppliers, subcontractors, customers, and other business partners.
 - In some cases it may be beneficial to foster long-term relationships with suppliers, contractors and subcontractors.
- Supply chains
 - We will check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
 - We tell the companies we do business with that we are not prepared to accept any form of exploitation.
 - All our standard supplier contracts will contain an anti-slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking.
- General recruitment
 - We always ensure all staff have a written contract of employment.
 - We always ensure staff are legally able to work in the UK (and other jurisdictions where required).
 - We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
 - Salary payments will only be made to accounts in the individual employee's name.
 - If, through our recruitment process, we suspect someone is being exploited, the HR department or recruiting manager will follow our reporting procedures (See Reporting slavery paragraph 6 below).

Identifying Slavery

We are aware that there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim. Staff and contractors are made aware of this list through the induction process on joining.

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.

- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Reporting Slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.
UK Modern Slavery Helpline on 0800 0121 700

<https://www.modernslaveryhelpline.org>

If you think that someone is in immediate danger, dial 999.

Otherwise, please raise any concerns with a Director or HR who can help to decide on a course of action.

Validity and document management

This document is valid as of July 2021

The owner of this document is HR, who will check and, if necessary, update the document at least once a year.

Queries may be directed to hr@matrixbooking.com