



# **The Big Bear Cider Mill Ltd Modern Slavery Policy**





Name: Modern Slavery Policy

Ref: CMS 10

**Status of the document**

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Author:	Kathryn Hughes
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**Version control**

Version	Type of Change	Date	Revisions from previous issues
0.1	Initial Draft	05.10.2018	Initial draft of the document
1.0	Final Version	05.11.2018	
1.1	Final Version	05.11.2019	Minor amendments
1.1	Final Version	05.10.2020	

For and on behalf of The Big Bear Cider Mill Ltd

Name: Kathryn Hughes

Position: Director

Signed:

Date: 5th October 2020



### **Aims of this policy**

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for, or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, apprentices and any other third party representative.

We expect all who have, or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its' values. This will be via our public statement on our website.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

### **What do we mean by modern slavery?**

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

1. Slavery – where ownership is exercised over an individual
2. Servitude – involves the obligation to provide service imposed by coercion
3. Forced and compulsory labour – all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
4. Human trafficking – involves arranging or facilitating the travel of another with a view to exploiting them.
- 5.

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.
- All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

### **How we seek to embed our anti-slavery policy in practice**

To underpin our policy commitments, we are in the process of implementing the following measures over the course of the financial year 2020/2021:



- All Company policies are posted on our staff intranet.

### **Responsibility for this policy**

The directors have overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

All managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

All employees who suspect any members of the workplace being victim of modern slavery should notify a director.

### **Breaches of this policy**

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee or director of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from Kathryn Hughes Financial Officer.

### **Status of this policy**

This Anti-slavery policy will be reviewed by the Company's directors on an annual basis. This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

We will continue to review processes and adhere to current legislation.

### **Links and Further information**

Modern Slavery Act 2015

[https://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga\\_20150030\\_en.pdf](https://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf)

Transparency in Supply Chains

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide>

<https://www.gla.gov.uk/media/5917/spotting-the-signs-mini-guide.pdf>