

## Flm- Policies Anti-Slavery Policy

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First & Last Mile Cic (FLM) understands the importance of conducting our business ethically and we place the same expectations on our suppliers. This statement is made on behalf of FLM, pursuant to section 54 of the Modern Slavery Act 2015 ("Act") and sets out the steps we are taking to eliminate Modern Slavery from within our operations and suppliers.

We seek to reassure our customers, partners, investors and employees that Modern Slavery, including forced labour and human trafficking has not unknowingly found its way into our supplierss. This statement is reviewed and, where necessary, updated prior to each new financial year to evidence FLM's continuing commitment to our obligations under the Act.

#### Our Approach to Modern Slavery And Human Trafficking

FLM is committed to adhering to and complying with the Act and does not knowingly employ or condone the use of forced labour, including child labour or bonded labour.

Recruiting of new employees includes identity, right to work and residency status checks to ensure potential employees are identified effectively using official forms of identification.

These background checks form the basis of FLM being able to make an offer of employment to individuals who are successful during the interview process. FLM recruits for full-time, part-time, temporary and fixed term positions.

Temporary & Volunteer workers are taken into the business with the same policy and process as permanent employees and contractors. All employees and volunteers are required to have Enhanced DBS Checks and we take our duties of care and responsibility seriously.

Compliance training and awareness is ongoing and monitored by Senior Management throughout the year to ensure this is maintained at appropriate levels.

Through our <u>whistleblowing policy</u> volunteers & staff have the opportunity to report unethical or illegal behaviours, such as Modern Slavery, through anonymous reporting to the Director responsible for Compliance who will independently investigate any report submitted.

FLM remains aware of updates made to the Modern Slavery Act 2015 guidance and various sources are utilised throughout the year to monitor any changes or updates that may be required in line with the legislation. Sources such as HM Government UK Annual Report on Modern Slavery and National Crime Agency National Strategic Assessment amongst others, are utilised for this purpose. FLM also evidences adherence to the legislation by uploading its annual Modern Slavery statement to the Government-run online Modern Slavery statement registry;



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#### **Due Diligence**

The nature of our business is such that our supplierss are short and assessed as low risk. We continue to carry out due diligence on our suppliers to ensure that our oversight is suitable and sufficient and matches the low level of risks we identified from our formal risk assessment.

Our existing approach to Modern Slavery and Human Trafficking assists in minimising the risk of these scenarios occurring within the business and our suppliers, but is something FLM remains mindful of even if they do not present an immediate or significant risk impact.

#### **Risk Management & Assessment**

The nature of our business and our suppliers is a relatively simple model, which allows us to assess the risk of potential Modern Slavery offences taking place as low. However, FLM remains committed to ensuring Modern Slavery does not find a way into any existing, or future, suppliers relationships. The FLM business model ensures that applicable contracts with customers and suppliers meet its expectations and standards where the potential for Modern Slavery risk is identified.

#### **Key Performance Indicators**

FLM does not currently consider its suppliers to be vulnerable to pressures around service level agreements, pricing and cost reduction. However, we remain mindful of how these areas, amongst others, can leave a business vulnerable to the risks of Modern Slavery, and we continue to monitor the impact of service level agreements on our suppliers. Whilst not identifying the need for KPIs to monitor performance we are committed to regularly monitoring and reviewing our suppliers to ensure our assessment remains valid.



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### **Document Distribution, Review & Authority**

This document is available in the drivers Handbook, on the FLM Intranet.

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This policy will be reviewed, approved and endorsed by the Directors.

Name Andy Swarbrick

Position Director

Signed

Dated 13 Apr 2023