



---

# ANTI-SLAVERY AND HUMAN TRAFFICKING

---



## ANTI-SLAVERY AND HUMAN TRAFFICKING

---

*Applicable to employees of Praxis Real Estate Management Limited, Praxis Facilities Management Ltd and Praxis Capital Limited (together "Praxis" or the "Company").*

### PURPOSE AND SCOPE

---

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, contractors and suppliers.

Praxis strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers and contractors to the same high standards.

### DEFINITION

---

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

### OUR COMMITMENT

---

We comply with all relevant legislation, including the Modern Slavery Act 2015 and any subsequent amendments or regulations.

We are committed to ensuring that slavery and human trafficking have no place in our business or supply chains. We strive to uphold the highest ethical standards, promoting transparency, integrity, and respect for human rights in all our activities.

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy
- We take a risk-based approach to our contracting processes and keep them under review. Using this approach, we will also assess the merits of writing to suppliers requiring them to comply with this policy, which sets out the minimum standards required to combat modern slavery and trafficking
- Consistent with our risk-based approach we may require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with this policy as part of our due diligence process
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with this policy
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships



## DUE DILIGENCE

---

We undertake thorough due diligence processes to assess and manage the risk of slavery and human trafficking within our supply chains. Our due diligence efforts include, but are not limited to:

- **Supplier Evaluation:** We evaluate and assess our suppliers' compliance with anti-slavery and human trafficking standards. This includes reviewing their policies, practices, and procedures to ensure alignment with our values.
- **Risk Assessment:** We conduct risk assessments to identify high-risk areas within our supply chains, considering factors such as geographical locations, industries and services provided. Based on these assessments, we implement risk mitigation strategies.
- **Supplier Agreements:** We include contractual provisions requiring suppliers to comply with all applicable laws, regulations, and ethical standards, including those related to slavery and human trafficking.
- **Monitoring and Auditing:** We maintain an ongoing monitoring process to review supplier performance and conduct periodic audits to assess compliance with our policies.
- **Recruitment:** We maintain fair and ethical recruitment and employment practices that adhere to all relevant employment legislation. These practices include ensuring that our recruitment processes comply with anti-slavery and human trafficking laws, as well as conducting thorough checks on employment agencies, ensuring they comply with legal requirements and ethical standards.

## EMBEDDING OUR POLICY

---

We will continue to embed the principles contained within this policy through:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- Ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK
- Making sure Praxis procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- Continuing to take action to embed a zero-tolerance policy towards modern slavery
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers have sufficient knowledge and understanding of modern slavery and ethical employment practices

## RESPONSIBILITY AND ACCOUNTABILITY

---

The responsibility for the implementation and compliance of this policy rests with all employees and management within the Praxis Group. The Board of Directors is accountable for ensuring the policy's effectiveness and ongoing review.

This policy will be reviewed regularly to ensure its continued relevance and effectiveness in combating slavery and human trafficking.

**Signed:**

*James Hewitt*

James Hewitt, Chief Operating Officer

**Date:** 1<sup>st</sup> April 2023