

# Anti-Slavery & Human Trafficking Policy

Effective Date: 1st October 2025

### 1. Purpose

The purpose of this policy is to set out Confi Consultancy Ltd's commitment to preventing modern slavery, human trafficking, and any form of forced labour within our operations and supply chains.

## 2. Policy Statement

Confi has zero tolerance for modern slavery in any form. We are committed to acting ethically and with integrity in all business dealings and relationships. We expect the same high standards from all suppliers, subcontractors, and partners.

## 3. Scope

This policy applies to:

- All Confi employees (current and future)
- All subcontractors working with or on behalf of Confi.
- Any supplier or partner providing services to Confi.

## 4. Our Responsibilities

Confi will:

- Operate transparently and ethically at all times.
- Ensure suppliers meet the standards outlined in this policy.
- Conduct proportionate due diligence during onboarding.
- Maintain up-to-date awareness of modern slavery risks.
- Act on any suspicion or evidence of unethical behaviour

#### 5. Supplier and Subcontractor Expectations

All suppliers and subcontractors engaged by Confi must:

- Comply with the Modern Slavery Act 2015
- Not engage in forced labour, child labour, human trafficking, or exploitative practices
- Maintain appropriate policies or governance relevant to their size.
- Allow Confi to terminate the relationship if a breach of this policy is identified.

# 6. Identifying and Reporting Concerns

Any concerns relating to potential modern slavery issues must be reported immediately to the Director. Confi will investigate all concerns promptly and take appropriate action.

# 7. Training & Awareness

Confi will ensure individuals involved in procurement, subcontracting, or supplier selection understand:

- What modern slavery is
- How to recognise indicators
- How to report concerns
- Their responsibilities under this policy

# 8. Compliance

Any breach of this policy may result in disciplinary action for employees or termination of contract for suppliers or subcontractors.

#### 9. Review

This policy will be reviewed annually to ensure continued relevance and alignment with legislation and ethical best practice.

**Approved by:** Simon Coulton, Director

Date: October 2025