POLICY

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Anti-Slavery Policy

Policy

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Introduction

Compufile Systems Limited ("CSL") is committed to acting ethically and with integrity in all of our business dealings and relationships. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to ensuring that neither exists within our business or our supply chain.

We recognise our responsibility under the Modern Slavery Act 2015 and are committed to implementing appropriate measures to prevent slavery, forced labour, debt bondage, human trafficking and exploitation.

This policy applies to all employees, directors, contractors, consultants, agency workers and any third parties acting on behalf of CSL.

Policy statement

CSL is committed to:

- Complying with the requirements of the Modern Slavery Act 2015.
- Acting ethically and with integrity in all business relationships.
- Taking reasonable steps to identify and mitigate the risk of modern slavery within our business activities and supply chain.
- Ensuring that all employees have the legal right to work in the UK.
- Encouraging the reporting of concerns and protecting those who raise genuine concerns in good faith.
- Working with suppliers and business partners who share our commitment to ethical business practices.

We will not knowingly support or engage with any organisation involved in slavery, human trafficking or other forms of exploitation.

Responsibilities

Preventing, detecting and reporting modern slavery is the responsibility of everyone working for or on behalf of CSL.

All employees are expected to:

- Remain alert to potential indicators of modern slavery.
- Report any concerns or suspicions as soon as possible.
- Cooperate with any investigation into potential breaches of this policy.

Managers are responsible for promoting awareness of this policy and ensuring any concerns raised are taken seriously and investigated appropriately.

Recruitment & employment practices

CSL is committed to maintaining fair, ethical and lawful employment practices. We:

- Carry out recruitment activities in a fair, transparent and non-discriminatory manner.
- Conduct recruitment activities through reputable and compliant recruitment agencies.
- Verify the right to work of all employees before employment begins.
- Comply with relevant UK employment and immigration legislation.
- Offer competitive pay and benefits, which are reviewed regularly.
- Ensure all employment is freely chosen and do not tolerate forced, bonded, involuntary or exploitative labour in any form.
- Encourage employees to report any concerns relating to unethical employment practices through the appropriate reporting channels.

Suppliers and business partners

As an SME providing software, data and business services, CSL considers the risk of modern slavery within its operations to be low. However, we recognise that risks may exist within wider supply chains.

To minimise this risk, CSL will:

- Build relationships with reputable suppliers and service providers and, where practical, seek to work with local suppliers and businesses.
- Consider ethical business practices when selecting suppliers.
- Expect suppliers and contractors to comply with applicable employment and anti-slavery legislation.
- Raise concerns where information suggests a supplier may not be operating responsibly.

Where appropriate, we may request suppliers to confirm their compliance with the Modern Slavery Act 2015 or equivalent legislation.

Reporting Concerns

Any employee who becomes aware of, or suspects, modern slavery or human trafficking should report their concerns to their manager, HR, or a director as soon as possible.

Reports will be treated seriously and investigated appropriately. CSL will not tolerate any form of retaliation against an individual who raises a genuine concern in good faith, even where an investigation finds no evidence of wrongdoing. We are committed to fostering a culture where concerns can be raised openly and have policies and procedures in place to support and protect whistleblowers.

Training and awareness

CSL will ensure that employees are aware of this policy and understand their responsibilities in identifying and reporting concerns relating to modern slavery and human trafficking. Guidance and awareness materials will be provided, where appropriate, to help employees recognise potential indicators and understand how concerns can be raised.

Additional guidance may be provided to employees where there may be an increased responsibility for identifying and managing modern slavery risks.

Breaches of this policy

Any employee found to have breached this policy may be subject to disciplinary action, up to and including dismissal.

CSL reserves the right to terminate its relationship with suppliers, contractors or other third parties found to be involved in modern slavery, human trafficking or related offences.

Review

This policy will be reviewed annually to ensure it remains effective and reflects legal and regulatory requirements.

Document information

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Document history

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