
BMS Procedure – T9003 Modern Slavery and Human Trafficking Policy

Triple 9 Group Limited is committed to driving out acts of modern-day slavery and human trafficking within its business and from within its supply chain, including sub-contractors, and partners.

The Company acknowledges responsibility for the Modern Slavery Act 2015 and will ensure transparency within the company and with suppliers of goods and services to the company. These, as well as the suppliers of services, make up the supply chain within Triple 9 Group Limited.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources is continually monitored.

Due to the nature of our business, we have a low risk of modern slavery internally and in supply chains. Our supply chains are limited, and we procure goods and services from a restricted range of UK and overseas (USA) suppliers, mainly as specified by clients. We follow the guidance provided by the Procurement Policy Note 05/19: Tackling Modern Slavery in Government Supply Chains, which is for government procurement but is helpful for any procurement process.

The company will not support or deal with any business knowingly involved in slavery or human trafficking. The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the company and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained upon request.

This policy statement will be reviewed annually and published.

This Policy considers, and supports, the policies, procedures and requirements documented in our Business Management System, compliant with the requirements of ISO 9001:2015. The implementation and operation of this management system underlines our commitment to this policy.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The company conducts diligent HR processes to ensure that employees have the right to work in the UK and have an appropriate work history to protect them from abuse and coercion.