

POLICY TITLE	Modern Slavery
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DETAILS OF POLICY UPDATES

DATE	DETAILS
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1 INTRODUCTION

Tute acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Tute understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Tute does not enter business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Tute in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

2 PURPOSE AND AIMS

Tute considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

3 RELATED POLICIES

- Safer Recruitment Policy
- Equality and Diversity Policy
- Safeguarding & Child Protection Policy
- Anti-Bullying and harassment Policy
- Online Safety Policy
- Behaviour Policy
- Whistleblowing Policy
- Serious Incident Policy

4 ROLES AND RESPONSIBILITIES

4.1.1 Supply Chains

In order to fulfil its activities, Tute's main supply chains are reviewed by the finance department.

We understand that Tute first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

4.1.2 Potential Exposure

In general, the organisation considers its exposure to slavery/human trafficking to be relatively limited, however, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

5 PROCESS

Tute carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Tute has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Tute has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.

- Build long-standing relationships with local suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point contact is preferably with a UK company and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

6 HOW TO REPORT A CONCERN

Tute has appointed the Head of HR and Compliance as the appointed person to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the organisation's obligations in this regard.

7 ANNUAL REVIEW

The Managing Allegations policy will be review on an annual basis