

# Anti-slavery Policy

EVS Valeting Ltd (EVS) is committed to preventing modern slavery and human trafficking occurring within our organisation and to tackling the risk of occurrence in our supply chain. This policy sets out measures we will take towards this and our expectations of our staff and third parties with whom we work.

## 1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed by the use of coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 This policy covers all four activities.

## 2 Identifying slavery

2.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

2.2 The following key signs could indicate that someone may be a slavery or trafficking victim:

- 2.2.1 the person is not in possession of their own passport, identification or travel documents;
- 2.2.2 the person is acting as though they are being instructed or coached by someone else;
- 2.2.3 they allow others to speak for them when spoken to directly;
- 2.2.4 they are dropped off at and collected from work;
- 2.2.5 the person is withdrawn or they appear frightened;
- 2.2.6 the person does not seem to be able to contact friends or family freely; and/or
- 2.2.7 the person has limited social interaction or contact with people outside their immediate environment.

2.3 This list is not exhaustive.

2.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

2.5 If you have a suspicion, report it (see clause 7).

### **3 How is it relevant to us?**

- 3.1 Modern slavery is a complex and sophisticated crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.
- 3.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. More importantly, it is simply the right thing to do.
- 3.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.
- 3.4 Due to the size of our business we are not required to publish an annual slavery and human trafficking statement detailing steps taken to prevent modern slavery in our own business and supply chains. However, due to the nature of the valeting industry, we consider it important to pay close attention to the features of our industry that may be vulnerable to these types of practice, particularly when outsourcing valeters.

### **4 Responsibilities**

- 4.1 EVS, our managers and colleagues have responsibilities to ensure our fellow workers, and valeters, are safeguarded, treated fairly and with dignity.
- 4.2 The Managing Director is responsible for our compliance with our legal and ethical obligations in relation to modern slavery.
- 4.3 Everyone working for us including valeters, employees, contractors, and consultants must observe this policy and be aware that turning a blind eye is unacceptable, and simply not an option.

#### **4.4 Organisation responsibilities**

We will:

- 4.4.1 assess the risk of modern slavery and human trafficking occurring within our organisation and supply chain, and commit to taking steps to reduce those risks;
- 4.4.2 ensure we meet applicable legal obligations;
- 4.4.3 regularly check identification of valeters and workers;
- 4.4.4 develop and communicate internally and to our suppliers if requested, our policies and procedures, aimed at preventing slavery and human trafficking and protecting our workforce and reputation;
- 4.4.5 be clear about our recruitment policy and lead by example by making appropriate checks on all staff and contractors to ensure we know who is working for us and by ensuring all those working for us are aware of this policy as part of our onboarding);
- 4.4.6 check our supply chains;
- 4.4.7 ensure we have open and transparent reporting and grievance processes for all staff, and that there are no barriers to reporting modern slavery concerns or breaches of our policies;
- 4.4.8 raise awareness (including posters in the valet bays) so that our colleagues know what we are doing to promote their welfare; and

4.4.9 ensure any incident of modern slavery is dealt with appropriately and relevant remedies are made available to victims.

#### **4.5 Manager responsibilities**

Managers will:

- 4.5.1 listen and be approachable to colleagues;
- 4.5.2 respond appropriately if they are told something that might indicate a colleague or any other person is being exploited;
- 4.5.3 remain alert to indicators of slavery;
- 4.5.4 raise the awareness of our colleagues, by discussing issues so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- 4.5.5 use their experience and professional judgement to gauge situations.

#### **4.6 Colleagues**

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- 4.6.1 keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see clause 7);
- 4.6.2 follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.

### **5 Our procedures**

#### **5.1 Supply chains**

- 5.1.1 We check and monitor our supply chains to identify, assess and manage modern slavery risks.
- 5.1.2 We seek, where possible, to incorporate anti-slavery obligations in our supplier contracts.

#### **5.2 Recruitment**

- 5.2.1 We are committed to ensuring that we have clear and fair recruitment policies and procedures.
- 5.2.2 We always ensure that prior to starting work, all staff have a written contract describing their work, in an appropriate language, and that they have not had to pay any direct or indirect fees to obtain work.
- 5.2.3 We always ensure staff are legally able to work in the UK.
- 5.2.4 We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- 5.2.5 All new recruits go through an induction to ensure they are aware of our way of working, our policies and procedures, where to find out about any updates

5.3 If, through our recruitment process, we suspect someone is being exploited, we will follow our reporting procedures (See clause 7).

## **6 Anti-slavery statement**

6.1 We make a clear statement to demonstrate that we take our responsibilities to our employees, valeters, people working within our supply chain and our customers seriously.

6.2 This statement will be approved by the Managing Director

6.3 We make this statement on our website.

## **7 Reporting slavery**

7.1 We encourage anyone affected by modern slavery or human trafficking, or anyone with concerns that someone within our organisation, supply chain or business associates is affected by modern slavery and human trafficking to speak up. If you raise a concern under this policy in good faith, we will support you, even if you turn out to be mistaken.

7.2 Talking to someone about your concerns may stop someone from being exploited or abused.

7.3 If you think that someone is in immediate danger, dial 999.

7.4 Otherwise, you should discuss your concerns with your local manager, who will decide a course of action and provide any further advice.

7.5 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger you discuss your concerns first with your local manager before taking any further action.

7.6 We have procedures in place to investigate any concerns raised and to ensure where appropriate remedial action is taken. Our procedures put victims and workers first. Where an issue concerns part of our supply chain we are committed to working with those supply chain members to facilitate improvement and education to reduce the risk of future slavery occurrences. Whilst we may consider terminating our relationship, this will not be our starting point.

## **8 Monitoring and review**

8.1 We will review, on an annual basis, the following:

8.1.1 our existing and emerging legal obligations;

8.1.2 our Anti-slavery policy and statement, along with any associated policies, processes and procedures;

8.1.3 feedback from stakeholder engagement, our audit process and our colleagues;

8.1.4 the effectiveness of our processes and procedures;

8.1.5 any recommended changes in our approach;

8.1.6 any suspected or identified cases of modern slavery; and

8.1.7 who it is appropriate to consult internally and externally regarding modern slavery risk.