

R & R C Bond (Wholesale) Limited

T/A

Bond International

Anti-slavery and human trafficking policy

## 1 What is slavery?

1.1 The Modern Slavery Act 2015 (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. References in this policy to slavery may include all or any of the above activities.

## 2 How is it relevant to us?

- 2.1 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more. It is also that the discovery of slavery in the company's supply chains would have a very serious and damaging effect on the company's business: if it were found that human beings had been exploited at some point in the company's supply chains, then the company could find itself as the subject of adverse publicity and it is likely that other businesses, both suppliers and customers, would cease dealing with the company. Some of our contracts with our larger customers include a contractual obligation on the part of the company to take steps to ensure that there is no slavery in our business or in our own supply chains.
- 2.2 Irrespective of obligations which are legally binding on the company or the possible effect on the company's business, there are overriding moral considerations. This company is committed to the effort to eradicate slavery from the modern world.
- 2.3 With this in mind, the company's management and all its staff need to pay particularly close attention to:
- 2.3.1 the company's supply chain including in particular the supply of tyres to the company;
  - 2.3.2 recruitment of employees;
  - 2.3.3 the use of staff supplied by agencies;
  - 2.3.4 any outsourced activities, including, for example, cleaning staff and even corporate hospitality.

### **3 Responsibilities**

- 3.1 The Operations Director will be responsible for monitoring the implementation of this policy
- 3.2 Every member of the company's staff has responsibility for observing and must observe this policy. In particular, each member of staff should look out for signs that an individual or individuals may be the subject of exploitation, and must report their concerns, as explained in this policy.

#### **3.3 Organisation responsibilities**

##### **3.3.1 The company will:**

- (a) maintain a clear policy with clear procedures designed to prevent exploitation and human trafficking both in the company's supply chains and its own workforce;
- (b) include clear obligations in its purchase contracts to require its suppliers to adopt anti-slavery and human trafficking measures;
- (c) carry out a risk assessment to identify the particular areas of risk in the company's supply chains;
- (d) carry out due diligence in relation to the company's suppliers as part of a risk based approach; due diligence may include requesting suppliers to complete appropriate audit questionnaires and visits to suppliers as part of the audit process;
- (e) design a recruitment policy and procedures with appropriate steps to prevent exploitation and human trafficking;
- (f) make appropriate checks on employees to ensure that none of them is being exploited by a third party;
- (g) carry out due diligence in relation to recruitment agencies and make checks on agency workers to ensure that they are not being exploited by a third party;
- (h) ensure we have a suitable grievance process which can be used by all staff, including agency workers;
- (i) raise awareness amongst managers and employees of the risks of slavery and human trafficking in relation to our business and our supply chains by providing training to enable them to identify risk factors and to encourage them to report them; and
- (j) make and publish a clear statement setting out the steps we have taken and plan to take to ensure slavery and human trafficking is not taking place in our supply chains.

#### **3.4 Manager responsibilities**

##### **3.4.1 Managers will:**

- (a) remain alert to indicators of slavery;
- (b) respond appropriately if they are told something which may indicate that person is being exploited by a third party;



- (c) generally support this policy, for example, by discussing issues and providing training, so that everyone is able to spot the signs of exploitation or human trafficking and knows what to do;
- (d) take appropriate action, including obtaining further advice from the company's human resource department and internal legal counsel.

### **3.5 Other employees**

All employees have responsibilities under this policy. Whatever your role or level of seniority, you must keep your eyes and ears open: if you suspect someone (whether a person or persons at work or a person or persons in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure which is set out in this policy below.

## **4 The risks and managing the risks**

### **4.1 The principal areas of risk we face in relation to slavery and human trafficking, include the following:**

4.1.1 The company purchases tyres from manufacturers in Europe and the Far East, including China. Whilst not the country identified in published information as being the place where modern slavery is most prevalent, China is identified as a "high risk" area, that is of their being slavery in the supply chain of goods which come from China, and even countries in the European Union are identified as being "medium risk".

4.1.2 As part of its human resourcing strategy, the company engages agency workers to supplement its workforce. This means that some people who work in the company are not employed directly by the company, but are employed by a third party agent, which is responsible for their recruitment, their terms and conditions of employment, including paying them, and which supplies them for work to the company. The company does not usually have the opportunity, therefore, to interview them and to check that they are working as a matter of their own choice and also their right to work in this country, for example.

4.1.3 Generally, direct recruitment is thought to be less of a risk in relation to slavery and human trafficking, but we need to remain vigilant to the possibility that an employee or employees, especially warehouse operatives and drivers, may be being controlled by a third party, that they do not have freedom of choice about their employment and that their wages are being handed over to a third party, for example.

### **4.2 We manage these risk areas through our procedures set out or mentioned in this policy. In particular the company will do the following:**

4.2.1 The company will ensure that its anti-slavery and human trafficking policy is communicated to its supplier and that there are included in contracts with suppliers appropriate terms relating to slavery and human trafficking in relation to their own businesses and their own supply chains.

4.2.2 The company will establish an ongoing system of monitoring suppliers. This will involve the sending of audit questionnaires for completion and return to suppliers.

4.2.3 In the case of suppliers which are identified as being higher risk, the company will arrange visits to the relevant suppliers in order to carry out an audit, including interviews with managers and workers and inspection of facilities, and will record their findings.

4.2.4 The company will undertake due diligence in relation to the agencies which it uses to engage staff. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks;
- investigating reputation;
- ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas);
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying;

4.2.4 The company will include in its recruitment procedure appropriate steps intended to verify that the employee is not the subject of exploitation by a third party and has the right to work in this country.

- We will ensure that staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work;
- We always ensure staff are legally able to work in the UK;
- 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);
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

4.2.5 The company will arrange and deliver training to managers and other staff to enable them to understand the risks of slavery and human trafficking, to recognise risk indicators and to understand the procedure for reporting their concerns.

## **5 Identifying slavery**

5.1 There is no typical victim of slavery. Some victims do not understand they have been or are being exploited and are entitled to help and support.

5.2 The following are indicators that someone may be a victim of slavery or trafficking:

- 5.2.1 the person is not in possession of his or her own passport, identification or travel documents;
- 5.2.2 the person is acting as though he or she is being instructed or coached by someone else;
- 5.2.3 the person allows others to speak for him/her when spoken to directly;
- 5.2.4 the person is dropped off at and collected from work;



5.2.5 the person is withdrawn or appears to be frightened;

5.2.6 the person does not seem to be able to contact friends or family freely;

5.2.7 the person has limited social interaction or contact with people outside his or her immediate environment.

This list is not exhaustive.

A person may display a number of the indicators set out above but may not necessarily be a victim of slavery or human trafficking. Sometimes it is a case of building a picture of the person's circumstances which may indicate something is not quite right.

5.3 If any member of the company's staff has a suspicion that a person may be a victim of slavery or human traffic, it should be reported.

## **6 Reporting slavery**

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

6.2 Otherwise, you should discuss your concerns with someone in the the Human Resources Department or one of the company's internal legal counsel, who will decide a course of action and provide any further advice.

6.3 Not all victims may want help. There may be instances where reporting a suspected case puts the potential victim at risk, so it is important that in the absence of an immediate danger, members of staff discuss their concerns first with someone in the Human Resources Department or one of the company's internal legal counsel before further action is taken.

## **7 Training**

7.1 The company will provide specific training to those staff members who are involved in managing recruitment and our supply chains or who may be involved in an audit of or a visit to a supplier.

7.2 The company will provide general awareness training to other staff.

Adopted by the Board

for Year to 31/12/24 on 25/4/25