

ANTI – SLAVERY POLICY

1 WHAT IS SLAVERY?

1.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part.

1.2 As a SaaS Provider, Fourth Limited is a very low-risk business, however we take compliance with the Modern Slavery Act very seriously.

1.3 The Modern Slavery Act 2015 covers four activities:

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

1.4 This policy covers all four activities.

1.5 The Modern Slavery Act 2015 recognises the important part organisations can and should play in tackling slavery. With this in mind, we need to pay particularly close attention to:

1.5.1 our supply chain;

1.5.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards.

2 RESPONSIBILITIES:

2.1 Fourth Limited (“**Fourth**”), as well as its officers and employees, have responsibilities to ensure that all workers are safeguarded, treated fairly and with dignity.

2.2 Everyone must observe this policy:

2.2.1 Fourth will:

2.2.1.1 maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;

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- 2.2.1.2 be transparent about our recruitment policy (see 'Recruitment' paragraph 4.3 below);
- 2.2.1.3 review our supply chains (see 'Supply Chain' paragraph 4.2 below);
- 2.2.1.4 lead by example by making appropriate checks on all employees, recruitment agencies and suppliers;
- 2.2.1.5 ensure we have in place an open and transparent grievance process for all staff;
- 2.2.1.6 seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- 2.2.1.7 make a clear statement that we take our responsibilities to our employees and our customers seriously (see our *Modern Slavery Act Statement* on our website).

2.3 Managers:

2.3.1 Managers will:

- 2.3.1.1 listen and be approachable to colleagues;
- 2.3.1.2 respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- 2.3.1.3 remain alert to indicators of slavery;
- 2.3.1.4 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
- 2.3.1.5 use their experience and professional judgement to gauge situations.

2.4 Everyone:

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

- 2.4.1.1 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 'Reporting Slavery', paragraph 6 below);
- 2.4.1.2 follow our reporting procedure if a colleague tells you something that you think might indicate that they are or someone else is being exploited or ill-treated; and
- 2.4.1.3 tell us at legal@fourth.com if you think there is more we can do to prevent people from being exploited.

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3 THE RISKS

3.1 As a SaaS provider, we are an extremely low-risk organisation. However, we are aware that typically the areas of risk related to slavery and human trafficking include:

- 3.1.1 supply chains;
- 3.1.2 recruitment through agencies; or
- 3.1.3 general recruitment.

3.2 We manage these risk areas through our procedures set out in this policy.

4 OUR PROCEDURES

4.1 Modern Slavery Act Statement:

- 4.1.1 We make a clear annual statement that we take our responsibilities to our employees and people working within our supply chain seriously; and
- 4.1.2 We make this statement as part of our company reporting.

4.2 Supply Chains:

- 4.2.1 We will review our existing suppliers' policies and statements on their websites and, if necessary, request that they confirm they do not engage in any slavery or human trafficking; and
- 4.2.2 We tell the companies that we do business with that we are not prepared to accept any form of exploitation.

4.3 Recruitment:

- 4.3.1 Fourth has recruitment processes and controls in place to ensure that:
 - 4.3.1.1 All staff are assessed for their right to work;
 - 4.3.1.2 Our recruitment service providers sign up to our terms and conditions and employment policies;
 - 4.3.1.3 Workplace equality policies are in place; and
 - 4.3.1.4 Wages and benefits comply with relevant government legislation.
- 4.3.2 If, through our recruitment process, we suspect someone is being exploited, the People Operations department or recruiting manager will follow our reporting procedures (See 'Reporting Slavery', paragraph 6 below).

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5 IDENTIFYING SLAVERY

- 5.1 There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support.
- 5.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:
 - 5.2.1 The person is not in possession of their own passport, identification or travel documents;
 - 5.2.2 The person is acting as though they are being instructed or coached by someone else;
 - 5.2.3 They allow others to speak for them when spoken to directly;
 - 5.2.4 They are dropped off and collected from work;
 - 5.2.5 The person is withdrawn or they appear frightened;
 - 5.2.6 The person does not seem to be able to contact friends or family freely; and/or
 - 5.2.7 The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

- 5.3 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.
- 5.4 If you have a suspicion, report it.

6 REPORTING SLAVERY

- 6.1 Talking to someone about your concerns may stop someone else from being exploited or abused. If you think that someone is in immediate danger you should discuss your concerns with your line manager who will decide on an appropriate course of action. You can also make contact with the Modern Slavery Helpline by calling 0800 012 1700 or visiting their website at modernslaveryhelpline.org if you have any concerns.
- 6.2 Failing to report modern slavery or human trafficking may result in disciplinary action.

7 MONITORING OUR PROCEDURES

- 7.1 We will review this Policy on an annual basis.

END – Updated September 2019