

Modern Slavery and Human Trafficking Policy

Approved by the Board of ABC Life Support

Date: 1st September 2025

Next Review: 1st September 2026

1. Policy Statement

ABC Life Support has a zero-tolerance approach to modern slavery and human trafficking in all its forms, including slavery, servitude, forced and compulsory labour, bonded labour, child labour, and human trafficking.

We are committed to acting ethically and with integrity in all our operations and supply chains. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place in any part of our business or supply chains.

This policy applies to:

- All persons working for or on behalf of ABC Life Support in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, consultants and suppliers.
- All parts of our operations and our supply chain, both in the UK and overseas.

We expect our suppliers, contractors, and business partners to uphold the same high standards and to cascade these standards through their own supply chains.

2. Legal and Regulatory Framework

This policy reflects our obligations under:

- The **Modern Slavery Act 2015** (s.54: Transparency in Supply Chains).
- The **Nationality and Borders Act 2022** (as it relates to victim identification and support).
- The **Procurement Act 2023**, which requires exclusion of suppliers convicted of modern slavery offences.
- Relevant international standards, including the **UN Guiding Principles on Business and Human Rights (UNGPs)**, the **OECD Due Diligence Guidance**, and **BS 25700:2022** –

ABC life support

First aid training for all

Organisational responses to modern slavery.

We will comply with the **UK Government's updated Transparency in Supply Chains Guidance (2025)** and any future legislative reforms.

3. Governance and Accountability

- The **Board of Directors** has ultimate responsibility for ensuring compliance with this policy.
- Day-to-day responsibility sits with **Caroline Chalmers**, who will oversee implementation, risk assessments, due diligence, training, and annual reporting.
- All staff and contractors are required to comply with this policy and to report concerns.

4. Commitments

a. Risk Assessment and Due Diligence

We will:

- Map our supply chains to identify risk areas.
- Use a risk-based approach to assess suppliers and contractors, prioritising high-risk sectors and geographies.
- Require suppliers and recruitment agencies to comply with our **Supplier Code of Conduct**.
- Conduct due diligence and, where appropriate, audits or independent assessments.
- Take action where suppliers do not meet our standards, up to and including termination of contracts.

b. Remediation

If we identify modern slavery in our operations or supply chains, we will:

- Prioritise the safety and wellbeing of affected individuals.
- Work with appropriate authorities, NGOs, and partners to support victims.

ABC life support

First aid training for all

- Take corrective action with suppliers, including remediation where possible, or terminate relationships where breaches cannot be resolved.

c. Training and Awareness

- All employees will receive training on recognising and preventing modern slavery.
- Procurement, HR, and leadership staff will receive enhanced training.
- We will provide guidance and capacity-building support to suppliers where feasible.

d. Monitoring and Continuous Improvement

- We will track our performance using KPIs such as: % of staff trained, % of suppliers mapped, number of audits conducted, remediation outcomes achieved.
- We will review and update this policy annually, or sooner if legislation changes.
- We are committed to continuous improvement in our approach.

5. Reporting Concerns

- All workers, suppliers, and stakeholders are encouraged to report any suspicions or evidence of modern slavery.
- Reports can be made directly to **Caroline Chalmers, our MD**.
- We will not tolerate retaliation against anyone who raises a concern in good faith.

6. Consequences of Breach

Any individual or organisation found to be in breach of this policy may face:

- Disciplinary action (for employees).
- Contract termination (for suppliers/contractors).
- Reporting to relevant authorities.

7. Approval and Review

This policy is approved by the **Board of Directors of ABC Life Support**.

It will be reviewed annually and updated to reflect legislative and regulatory changes.

Signed:

Caroline Chalmers

Managing Director

1st September 2025