



## Business Modelling Associates UK Ltd Anti-Slavery and Human Trafficking Policy

The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosures are intended to provide clients with the ability to make better, more informed choices about the company which they support. Business Modelling Associates (UK) Ltd is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain.

Business Modelling Associates (UK) Ltd recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to encompass various forms of coerced labour.

Our commitment to human rights is outlined in our Code of Conduct. We have a commitment to improve and implement the Code of Conduct across our supply chain.

Business Modelling Associates (UK) Ltd takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. Our Code of Conduct states “We do not tolerate forced, debt bonded, indentured labour practices or human trafficking.

Business Modelling Associates (UK) Ltd does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We expect our suppliers and others to meet these expectations”. Our Code on Conduct also, in turn, provides that “forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used”.

We regularly notify our suppliers of their obligation to comply with our Code of Conduct. Our verification process involves an assessment of our suppliers, who are required to complete a self-assessment questionnaire, including questions targeted at slavery and human trafficking risk. Business Modelling Associates (UK) Ltd uses this questionnaire to determine the risk profile of suppliers for environmental, safety, human rights (including slavery and human trafficking) and other supplier sustainability issues. We view assessments and audits as integral parts of our overall supply chain management process. They help us identify compliance gaps where immediate action is needed, and root causes that enable development of systemic solutions and improvements.

Business Modelling Associates (UK) Ltd’s Chief Operational Officer sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations. Each year our Chief Operational Officer communicates with employees and senior managers regarding the importance of ethics and legal compliance. We believe that this “message from the top” along with ethics and compliance training and regular communication throughout the year, helps to create an ethical and legally compliant culture within the business.

Through our Code of Conduct we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our Code of Conduct reflect our policies related to but not limited to slavery, human trafficking, conflicts of interest, non-discrimination, antitrust, anti-bribery, and anti-corruption and protecting our company’s reputation.



## **Business Modelling Associates (UK) Ltd's Code of Conduct**

### Forced or Involuntary Labour

Workers shall not be subject to any form of forced, compulsory, bonded, indentured, or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

### Recruitment Fees

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

### Contracts of Employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

### Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports), is strictly prohibited. The retention of personal documents shall not be used as a means to bind workers to employment or to restrict their freedom of movement.

### Deposits

Migrant workers shall not be required to lodge deposits or security payments at any time.

### Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour.

The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited.

### Workplace Equality

All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

### Wages and Benefits

All workers shall be paid at least the minimum wage required by applicable laws, and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

### Working Hours

Workers shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working



hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognised collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Freedom of Movement and Personal Freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Grievance Procedures

An effective grievance procedure shall be established to ensure that any migrant worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

Private Employment Agencies and Labour Recruiters

Companies should hire migrant workers directly whenever possible. When the sub-contracting of recruitment and hiring is necessary, companies shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.

**Mark Penny**  
**Chief Operating Officer**  
**14<sup>th</sup> May 2018**

Next Review Due: May 2019