Modern Slavery Policy

PACE is committed to acting ethically, and with integrity, in all our business dealings and relationships. We want to make sure that modern slavery and human trafficking is not taking place within our business or its supply chains.

PACE is committed to the abolition of modern slavery and human trafficking. We undertake appropriate due diligence to assess the risk of such issues arising both within the business and within its supply chain and reports on steps taken on an annual basis.

What is modern slavery?

Slavery is not something which is confined to the history books. Modern slavery exists in many forms, even here in the UK. It is rooted in the idea of forced labour – positions where a person is required to work and cannot refuse to work or leave because of threats of violence, coercion or deception or abuse of power. It includes holding a person in a position of slavery, servitude, or forced or compulsory labour.

Our commitments in this area and how we will work to achieve them

It our priority that we operate ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Management are responsible for making sure that all those working for us have actively chosen to work with us and are not being coerced or controlled in any way. They will do this through regular audits, open discussion and by following up on any concerns raised.

We recognise that the biggest risk of modern slavery within our business comes from the actions of those in our supply chain. We look at each aspect of our supply chain and assess the risk in each area.

Where appropriate, we will require our suppliers to confirm that there is no slavery or human trafficking within their business or that of their suppliers.

We will take seriously all reports received raising concerns regarding modern slavery within our business and its supply chain, and we will investigate each one.

Your responsibilities

You should take the time to read and understand this Policy and appreciate the importance of working with us on modern slavery and human trafficking issues.

If your job involves procurement (i.e. you obtain goods or services for us as part of your job role), then you should make sure you follow all appropriate protocols before approving any

supplier. You should consider the following questions as part of any due diligence process:

- Does the business trade with or operate in countries that are a known risk for modern slavery (for example India, China, Pakistan, North Korea, Afghanistan, Eritrea or South Sudan)?
- Is the supplier aware of modern slavery, and does it appear to have the desire to address this risk?
- Is the business happy to provide information regarding its own supply chain?
- Does the business monitor its own suppliers?
- Are the staffing costs in line with what we would expect for the size of the business?
- Does the business have a whistleblowing policy in place?

The answers you receive to these questions can tell you a lot about the modern slavery risk posed by the potential supplier. You should seek further support from your manager if you have any concerns.

You should avoid any conduct which might lead to, or suggest, a breach of this Policy.

You should, using the procedure below, raise a concern at the earliest opportunity if you believe that a breach of this Policy has occurred or if you have any wider suspicion of modern slavery in any part of our business or supply chains.

What to do if you have a concern

If you believe or suspect that a breach of this Policy has occurred or that modern slavery or human trafficking may exist in a part of our business (or within our supply chains), then you should report your concern in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether something constitutes a breach of this Policy or indicates modern slavery or human trafficking, then we encourage you to discuss this issue with your manager.

If your concern relates to the conduct of a supplier, then you should not make any direct accusations or approaches to the supplier yourself. You should act in accordance with the protocol for raising concerns set out in our Whistleblowing Policy.

Appropriate reporting and breaches of this policy

We will support all who raise genuine concerns in good faith under this Policy. PACE are committed to ensuring that you do not suffer any detrimental treatment in any form as a result of raising genuine concerns in good faith under this Policy. If you believe you have suffered unfavourable treatment, then you should inform your manager or consult our Grievance Policy.

If you are found to have acted in breach of this Policy or contrary to its aims and objectives, then we may take disciplinary action against you up to and including termination of your employment. If you are not an employee, then we may terminate any other form of engagement you may have with us.