Anti-Modern Slavery Policy

Policy Statement

RR Alden Oxford LTD is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains. We have a zero-tolerance approach to modern slavery. We expect all persons and organisations with whom we do business to share our commitment to acting ethically and with integrity in all business dealings.

Purpose

This policy sets out our approach to preventing modern slavery and human trafficking in our operations and supply chains and ensuring that our diverse workforce—from many different backgrounds—is treated with dignity, respect and fairness.

Scope

This policy applies to:

All persons working for or on behalf of RR Alden Oxford LTD in any capacity, including employees, directors, officers, agency workers, seconded workers, interns, volunteers, agents, contractors, and suppliers.

All our supply chains, including subcontractors and suppliers of goods and services.

Definitions

Modern slavery includes, but is not limited to: slavery, servitude, forced labour, human trafficking, and other exploitative labour practices.

Human trafficking means arranging or facilitating the travel of another person for exploitation (which may include forced labour or sexual exploitation).

Our Commitments

Compliance with Laws

We will comply with the Modern Slavery Act 2015 and all other applicable legislation in the UK concerning modern slavery and human trafficking.

Due Diligence and Risk Assessment

We will assess the risk of modern slavery in our business and supply chains.

For high-risk suppliers or contractors, we will require evidence of their employment practices, working conditions, and treatment of workers.

We will include clauses in contracts requiring suppliers to adhere to our policy and to notify us if they become aware of any slavery, servitude, forced labour, or human trafficking in their operations.

Recruitment Practices

All staff will be recruited in a fair, transparent manner. Proof of identity, legal right to work, and appropriate checks will be carried out.

We will ensure that no employee is required to pay for their job (e.g. agency fees, visa fees) and that they are not indebted or coerced.

We will provide clear terms of employment, including pay, hours, leave entitlements, and rights.

Working Conditions &Pay

All employees will be treated fairly, regardless of background or nationality.
Working hours will comply with applicable laws.
Pay will meet or exceed legal minimums and reflect agreed contracts.
No one will be forced to work against their will or under threat or penalty.

Diversity, Inclusion, and Protection

We recognise that many of our staff come from diverse backgrounds, perhaps being migrants, from different nationalities, or socially or economically vulnerable. We will ensure our policy addresses specific risks to such individuals, including language barriers, visa dependency, or lack of awareness of rights.
Support will be available for those who may be vulnerable, with clear communication in languages or formats they understand.

Training and Awareness

We will provide training to all staff, especially those in hiring, HR, procurement, and supplier management, to understand the risks of modern slavery and how to spot signs.
We will maintain awareness-raising materials for staff and suppliers.

Reporting and Whistleblowing

We will establish and maintain safe, confidential channels for employees, contractors or others to report concerns about modern slavery.
We will protect whistle-blowers from retaliation.
All reports of suspected modern slavery will be investigated promptly and with seriousness.

Monitoring and Review

We will monitor how effectively this policy is implemented and enforce compliance with it.
We will review our policy and associated procedures annually (or more often if needed) to ensure they remain effective and up-to-date with laws.
Where we identify non-compliance, we will take corrective action.

Senior Management Accountability

Ultimate responsibility for preventing modern slavery rests with senior management. They will ensure this policy is communicated, resources are allocated, and accountability is clear.
This policy will be publicly available (for example via our website) so that employees, suppliers, contractors, clients, and members of the public know we take this seriously.

Approval

This policy was approved by the operational board of RR Alden Oxford LTD on 01/09/2025

Review

Next review due by 01/09/2026