

Anti-Slavery Policy Spitfires.com

1. Policy Statement

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. [Insert Organisation Name] has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships. We are dedicated to implementing and enforcing effective systems to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

2. Responsibility for the Policy

- **Board of Directors:** Has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- **Management:** Is responsible for ensuring those reporting to them understand and comply with this policy.
- **Employees:** All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3. Compliance and Staff Responsibilities

- You must read, understand, and comply with this policy.
- The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us.
- Any suspected breaches or instances of modern slavery must be reported to management immediately.

4. Supply Chain Due Diligence

Spitfires.com conducts due diligence on all suppliers before entering a contract. Our approach includes:

- Mapping the supply chain to assess product or geographical risks of modern slavery.
- Requiring new suppliers to confirm their adherence to ethical labour standards and the Modern Slavery Act 2015.
- Evaluating the effectiveness of our suppliers and their compliance with our policies.

5. Training and Awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Regular training will be provided as necessary.

6. Breaches of the Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.