

2.4. MODERN SLAVERY ACT & RIGHT TO WORK PROCEDURE

This statement is in reference to the Modern Slavery Act 2015 and stipulates that Sage is committed to tackling modern slavery and/or human trafficking; and furthermore Sage has a zero tolerance approach to modern slavery within our own operations and that of our supply chain. We are committed to acting ethically and total transparency in all business dealings whilst putting in place effective systems to safeguard against any form of modern slavery within our business and supply chain.

Our Business Policies

Sage BEC operate a number of internal policies to ensure our business is managed and maintained in an ethical and indiscriminating manner. These include the following:-

- Equal Opportunities Policy & Statement
- Recruitment Policy
- Ethical Policy & Code of Conduct
- Whistle Blowing Procedure

Due diligence and auditing the Supply Chain

Sage BEC operate a Supplier vetting policy for new suppliers & maintain a preferred supplier list. For new suppliers we do comprehensive background checks into their suitability which includes background checks into convictions of offenses relating to modern slavery. As Part of our contract with new suppliers they must agree that their practices do not contradict our own anti-slavery policies.

Furthermore they must agree to the following:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

Assessing & monitoring the risks

To ensure that suitable measures are taken to prevent Modern Slavery within our own operations or the supply chain, it is important that our own staff are aware of what to look out for and what constitutes Modern Slavery. Therefore the following actions will be instigated going forward:-

- Staff Training
- Modern Slavery focussed Toolbox talks
- Improving Supply Chain auditing & verification process

Right to Work in the UK

Sage have a responsibility to prevent the employment of illegal workers as direct employees or within our supply chain. To fulfil this duty, we follow a simple 3-step check to confirm that any potential employee is entitled to work in the UK.

Step 1 – Obtain

The Sage employee performing the check should obtain original documents from either List A or List B of acceptable documents stated in the Right to Work Checklist.

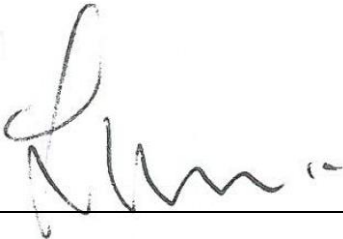
Step 2 – Check

- The documents must be checked that they are genuine with the following conditions:
- Photographs and date of birth are consistent across documents and with the person's appearance
- Expiry dates for permission to be in the UK haven't passed
- Any work restrictions to determine if they are allowed to do the type of work they are applying for (see checklist for further information)
- The documents are genuine, and have not been tampered with
- Any reasons for changes in names across different documents is clearly established and supporting documents are supplied and photocopied (such as marriage certificate, divorce decree, deed poll etc).

Step 3 – Copy

The Sage employee making the checks must retain a clear copy of the original documents. You should also mark on the document the date when the checks were mad. These copies must be retained for a minimum of 2 years from the date checked; and after this, the copies must be securely destroyed.

Upon the satisfactory completion of these checks, Sage can proceed with the employment process but the potential employee may be subject to a follow up check at a later date.

Signature 

Name Jerry Leach - Managing Director

Date October 2018 Review Date October 2019