



Merton Group

Cleaning and hygiene products that don't cost the earth

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

2017



1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 The board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Operations Co-ordinator has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering the risk of modern slavery.



2.3 Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Operations Co-ordinator.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 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 or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your line manager or the Operations Co-ordinator as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or report it in accordance with our Confidential Reporting Policies as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Operations Co-ordinator

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the line manager or HR department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.



4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy and on the risk that our business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy and/or are found to have been involved in modern slavery.

Signed:



Chris Taylor
Managing Director
Merton Group UK Ltd



SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE BOARD

Merton Group UK Ltd are committed to improving its practices to combat slavery and human trafficking.

ORGANISATION'S STRUCTURE

We are a manufacturer and supplier of cleaning and hygiene products. We have our head office in the UK and operate only in the United Kingdom.

OUR BUSINESS

Our business operates from Leicestershire and manufactures a number of different finished premium recycled paper products. We also supply cleaning and hygiene products to a variety of industries.

OUR SUPPLY CHAINS

Our supply chains include obtaining raw paper materials from a number of sources. Also, we work directly with chemical and plastic hardware manufacturers/suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and only work with suppliers that hold the same ethos. All suppliers are required to comply with our Value Chain Relationship Handbook.



▶ **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the business or in any of its supply chains.

▶ **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to develop training for our staff.

▶ **FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business. We intend to continue to work with our supply chain and impress upon them the need to adopt a similar policy if they are yet to do so.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.

Signed:



Chris Taylor
Managing Director
Merton Group UK Ltd





www.MertonGroup.co.uk



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