

## **Modern Slavery (Anti-Slavery and Human Trafficking) Policy**

### **Purpose**

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.

LTEN has a zero-tolerance approach to modern slavery. LTEN is committed to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery is not taking place in our business or in our supply chains.

LTEN is committed to ensuring transparency in business and in our approach to tackling modern slavery throughout our supply chains, consistent with disclosure obligations under the Modern Slavery laws/Act 2015. We expect the same standards from 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. We expect that our suppliers will hold their own suppliers to the same high standards.

### **WHO MUST COMPLY WITH THIS POLICY?**

This policy applies to all persons working for LTEN 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.

### **RELATED POLICIES AND PROCEDURES**

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies and procedures. Staff are encouraged to familiarise themselves with the policies detailed below. If you have any queries about this policy please contact your manager.

- Whistleblowing policy
- Equality & Diversity
- Safeguarding

### **RESPONSIBLE FOR THIS POLICY**

LTEN's Trustees have overall responsibility for ensuring this policy with senior managers comply with our legal and ethical obligations and that all staff comply with it. The senior management have primary day to day responsibility for implementing and monitoring its effectiveness and dealing with any queries relating to the policy. It is the duty of all managers to ensure that staff are inducted, understand, implement and comply with this policy. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

This policy will be reviewed yearly. However, LTEN may amend it at any time to update with best practices and processes.

### **COMPLIANCE WITH THIS POLICY**

All staff must ensure that they read, understand and comply with this policy.

Preventing, detecting, and reporting modern slavery in any part of LTENs business or supply chains is the responsibility of 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.

### **HOW AND WHEN TO NOTIFY IN CASE OF NON-COMPLIANCE**

If a staff member believes or suspect that a breach of this policy has occurred, or may occur in the future, you must inform your Manager and or senior managers immediately.

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

If a staff member believes or suspects a breach of this policy has occurred or that it may occur, then they must notify their manager and or senior managers at the earliest possible stage.

If a staff member is 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, they should raise it with their manager and or senior managers at the earliest possible stage.

LTEN encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. LTEN is 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 the business or in any of the supply chains. **(Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern).**

If a staff member believes that they have suffered any such treatment, they should inform their manager at the earliest possible stage. If the matter is not remedied, and you are an employee, you should raise it formally with the CEO who will inform the Board of Trustees and take appropriate action.

### **COMMUNICATION AND AWARENESS OF THIS POLICY**

Training on this policy, and on the risk LTENs business faces from modern slavery, forms part of the regular training for our employees.

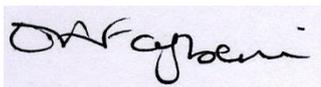
LTEN has commitment to addressing issues of modern slavery in our business and supply chains, which is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **BREACHES OF THIS POLICY**

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed:



Name: Toyin Fagbemi

Position: Chief Executive Officer