1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 This policy covers all four activities.

2 How is it relevant to us?

2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

2.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain;

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;

2.4.3 cleaning suppliers;

2.4.4 corporate hospitality;

3 Responsibilities

3.1 ATJ Group, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option. Failure to observe the policy may be dealt with as a disciplinary matter under the Disciplinary policy.

3.3 ATJ Group

3.3.1 We will:

(a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;

(b) be clear about our recruitment policy (see Recruitment);

(c) check our supply chains;

(d) lead by example by making appropriate checks on all employees, recruitment agencies and suppliers to ensure we know who is working for us;

(e) ensure we have in place an open and transparent grievance process for all staff;

(f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare;

(g) make a clear annual statement setting out the steps we have taken to ensure every effort is made to avoid slavery and human trafficking taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement).

3.4 Managers

3.4.1 Managers will:

(a) listen and be approachable to colleagues;

(b) respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation;

(c) remain alert to indicators of slavery (see Identifying slavery);

(d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do;

(e) use their experience and professional judgement to gauge situations.

3.5 Colleagues

3.5.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

(a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery);

(b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated;

(c) tell us if you think there is more we can do to prevent people from being exploited.

4 The risks

4.1 The principal areas of risk we face, related to slavery and human trafficking, include:

4.1.1 supply chains;

4.1.2 Recruitment;

4.2 We manage these risk areas through our procedures set out in this policy.

5 Our procedures

5.1 Anti-slavery statement

5.1.1 We make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

5.1.2 We make this statement available for all who wish to view it upon request, it is published on our website and it can be found in our policies file on our SharePoint for access by all members of the ATJ Group.

5.2 Supply chains

5.2.1 We check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

5.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.

5.2.3 We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check.

5.3 Recruitment

5.3.1 Using agencies

(a) We follow firm policy and only use agreed specified reputable recruitment agencies.

(b) To ensure the potential for slavery and human trafficking is reduced, we check recruitment agencies before adding them to our list of approved agencies. This includes:

(i) investigating reputation;

(ii) ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas);

(iii) ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.

(c) We keep agents on the list under regular review, at least annually.

5.3.2 General recruitment

(a) We always ensure all PAYE staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work;

(b) We always ensure staff are legally able to work in the UK;

(c) We provide information to all new PAYE recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

5.4 If, through our recruitment process, we suspect someone is being exploited, the HR & Training Manager will follow our reporting procedures (See Reporting slavery).

6 Identifying slavery

6.1 There is no typical victim, and some victims do not understand they have been exploited and are entitled to help and support.

6.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.

6.2.1 The person is not in possession of their own passport, identification or travel documents;

6.2.2 The person is acting as though they are being instructed or coached by someone else;

6.2.3 They allow others to speak for them when spoken to directly;

6.2.4 They are dropped off and collected from work;

6.2.5 The person is withdrawn or they appear frightened;

6.2.6 The person does not seem to be able to contact friends or family freely;

6.2.7 The person has limited social interaction or contact with people outside their immediate environment.

6.3 This list is not exhaustive.

6.4 If you have a suspicion, report it as set out under Reporting slavery.

7 Reporting slavery

7.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

7.2 If you think that someone is in immediate danger, dial 999.

7.3 Otherwise, you should discuss your concerns with Jamie Whitley – Finance Director, who will decide a course of action and provide any further advice.

7.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Jamie Whitley – Finance Director before taking any further action.

7.5 The Modern Slavery Helpline is available 24/7 and can be reached via phone: 08000 121 700 or online: https://www.modernslaveryhelpline.org/

7.6 Gangmasters & Labour Abuse Authority 'GLAA' is open 09:00 – 170:00 Monday – Friday for calls & emails only: 0800 432 0804 / contact@gla.gov.uk

8 Training

8.1 We provide training to those staff members who are involved in managing recruitment and our supply chains.

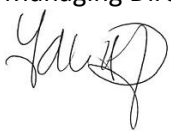
8.2 More general awareness training is provided to all staff through online training sessions, via team leaders or managers and toolbox talks on site.

9 Monitoring our procedures

9.1 We will review our Anti-slavery policy regularly, at least annually.

9.2 We will provide information and/or training on any changes we make.

Dale Harper-Jones
Managing Director



April 2026