



## Modern Slavery Policy and Procedure

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### 1. Introduction

**Wana Agency** is committed to operating in a manner that is ethical, responsible, and in full compliance with the law. We recognize the critical importance of combating modern slavery and human trafficking in all its forms. This policy outlines our approach to preventing modern slavery within our organization and our supply chains, ensuring that all our business practices reflect our commitment to human rights and the dignity of all individuals.

### 2. Purpose

The purpose of this Modern Slavery Policy and Procedure is to:

- Demonstrate our commitment to preventing modern slavery and human trafficking.
- Ensure that our business operations and supply chains are free from forced labor, human trafficking, and other forms of modern slavery.

- Provide guidelines for employees, contractors, and suppliers to identify, report, and address modern slavery risks.
- Promote transparency and accountability in our business practices.

### 3. Scope

This policy applies to all employees, contractors, suppliers, and partners of **Wana Agency**. It covers all aspects of our operations, including recruitment, procurement, and relationships with third-party suppliers and clients.

### 4. Definitions

**4.1. Modern Slavery** Modern slavery encompasses slavery, servitude, forced or compulsory labor, and human trafficking. These practices involve the exploitation of individuals for personal or commercial gain, often through coercion, threats, or deception.

**4.2. Human Trafficking** Human trafficking involves the recruitment, transportation, transfer, harboring, or receipt of persons by means of threat, force, or other forms of coercion for the purpose of exploitation.

**4.3. Forced Labor** Forced labor refers to any work or service that is exacted from a person under the threat of a penalty and for which the person has not offered themselves voluntarily.

### 5. Policy Statement

**Wana Agency** has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will take all necessary steps to ensure that modern slavery is not present in our operations or supply chains.

### 6. Responsibilities

#### 6.1. Senior Management

- Ensure that the Modern Slavery Policy is implemented and adhered to across the organization.
- Review and update the policy regularly to reflect changes in legislation, best practices, and organizational needs.
- Foster a culture of transparency and accountability, where employees feel empowered to report concerns about modern slavery.

#### 6.2. Human Resources

- Ensure that recruitment practices are fair, transparent, and in compliance with employment laws to prevent the exploitation of workers.
- Conduct due diligence on employees and contractors to ensure they are not subject to any form of modern slavery.

### **6.3. Procurement and Supply Chain Management**

- Assess and monitor the risk of modern slavery in the supply chains of goods and services used by **Wana Agency**.
- Ensure that all suppliers and contractors comply with this policy and the Modern Slavery Act 2015.
- Include clauses in supplier contracts that require compliance with anti-slavery laws and allow for audits of their practices.

### **6.4. Employees**

- Familiarize themselves with the Modern Slavery Policy and adhere to its guidelines in their daily work.
- Report any suspicions or evidence of modern slavery to their line manager or through the designated reporting channels.
- Participate in any training provided on modern slavery and human trafficking.

## **7. Risk Assessment and Due Diligence**

### **7.1. Risk Assessment**

- Conduct regular risk assessments of our operations and supply chains to identify areas where the risk of modern slavery is highest.
- Prioritize higher-risk areas for further investigation and monitoring.

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### **7.2. Supplier Due Diligence**

- Perform due diligence on new and existing suppliers to ensure they are committed to ethical labor practices.
- Require suppliers to provide evidence of their compliance with anti-slavery laws, such as audits, certifications, or policy statements.
- Review and update due diligence processes regularly to reflect changes in the risk landscape.

### **7.3. Audits and Monitoring**

- Conduct audits of high-risk suppliers and contractors to ensure compliance with this policy.
- Monitor supplier performance and take corrective action if any instances of modern slavery are identified.
- Work with suppliers to improve their practices or terminate relationships with those that fail to meet our standards.

## **8. Reporting and Whistleblowing**

## **8.1. Reporting Mechanisms**

- Encourage employees, contractors, and suppliers to report any concerns or suspicions of modern slavery or human trafficking.
- Provide multiple reporting channels, including a confidential whistleblowing hotline or email address, to ensure concerns can be raised safely and anonymously.

## **8.2. Whistleblower Protection**

- Protect whistleblowers from retaliation or victimization when they report concerns in good faith.
- Ensure that all reports are treated seriously, investigated promptly, and resolved fairly.

## **9. Training and Awareness**

### **9.1. Employee Training**

- Provide regular training on modern slavery, human trafficking, and the signs to look out for.
- Ensure that all employees, especially those involved in recruitment, procurement, and supply chain management, are aware of their responsibilities under this policy.

### **9.2. Supplier Engagement**

- Communicate our Modern Slavery Policy to all suppliers and contractors.
- Provide guidance and resources to suppliers to help them comply with our anti-slavery standards.

## **10. Continuous Improvement**

### **10.1. Policy Review**

- Review and update the Modern Slavery Policy annually or whenever significant changes occur in legislation, best practices, or organizational needs.
- Ensure that the policy remains relevant, effective, and aligned with legal requirements and industry standards.

### **10.2. Performance Monitoring**

- Monitor the effectiveness of the Modern Slavery Policy through regular audits, feedback, and reviews.
- Identify areas for improvement and implement changes to strengthen our approach to preventing modern slavery.

## **11. Non-Compliance**

### **11.1. Consequences of Non-Compliance**

- Take appropriate disciplinary action against any employee, contractor, or supplier found to be in violation of this policy.
- Terminate contracts with suppliers or contractors that fail to meet our anti-slavery standards, where necessary.

#### **11.2. Legal Obligations**

- Ensure full compliance with the Modern Slavery Act 2015 and other relevant legislation.
- Cooperate fully with any investigations by law enforcement or regulatory authorities into modern slavery allegations.

#### **12. Conclusion**

At **Wana Agency**, we are committed to ensuring that modern slavery and human trafficking have no place in our organization or supply chains. By adhering to this policy, we aim to protect the rights and dignity of all individuals and uphold the highest ethical standards in our business practices. We believe that through vigilance, transparency, and continuous improvement, we can make a meaningful contribution to the global fight against modern slavery.