

Modern Slavery & Human Trafficking Policy

1. Policy Statement

SeenEm[®] is committed to preventing modern slavery, forced labour, servitude and human trafficking in all its business activities and supply chains. We adopt a zero-tolerance approach to any form of slavery or human trafficking and are committed to acting ethically, transparently and with integrity in all our operations.

This policy is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps SeenEm[®] takes to ensure that modern slavery and human trafficking are not taking place within our business or supply chains.

2. Scope

This policy applies to all individuals and organisations working for or on behalf of SeenEm[®], including but not limited to:



Directors and officers



Employees



Contractors and consultants



Suppliers and partners



Any third parties engaged in the provision of services

Compliance with this policy is mandatory.

3. Legal and Regulatory Framework

SeenEm[®] operates in accordance with all applicable UK legislation, including but not limited to:



The **Modern Slavery Act 2015**



The **Employment Rights Act 1996**



The **National Minimum Wage Act 1998**



The **Human Rights Act 1998**



UK immigration and right-to-work legislation



Relevant safeguarding and labour-market enforcement regulations

4. Governance and Responsibility

The Board of SeenEm[®] has overall responsibility for ensuring this policy is implemented and adhered to.

Senior management is responsible for:



Assessing and managing modern slavery risks



Ensuring appropriate controls are in place



Investigating concerns and taking corrective action

All individuals working for or with SeenEm[®] are expected to comply with this policy and report concerns.

5. Due Diligence and Risk Assessment

SeenEm[®] undertakes proportionate due diligence to identify and mitigate the risk of modern slavery within its operations and supply chains. This includes, where appropriate:



Identity verification



Right-to-work checks



DBS verification where required



Supplier onboarding checks



Contractual assurances of compliance with the Modern Slavery Act 2015

Risk assessments are reviewed periodically and updated where necessary.

6. Ethical Recruitment and Employment Practices

SeenEm[®] is committed to ethical recruitment and employment practices and ensures that:



No worker is charged recruitment fees



Employment is entered into freely and voluntarily



Workers are paid at least the applicable National Minimum Wage



Working conditions comply with UK employment law



No coercion, threats or exploitation are tolerated

7. Supply Chain Standards

SeenEm[®] expects all suppliers and partners to:



Comply with the Modern Slavery Act 2015



Maintain appropriate policies and controls



Allow monitoring, audit or review where reasonably required

SeenEm[®] reserves the right to suspend or terminate relationships where modern slavery risks are identified or compliance is not demonstrated.

8. Training and Awareness

SeenEm[®] provides appropriate training to relevant staff to help them:



Understand modern slavery risks



Recognise indicators of exploitation



Know how to report concerns

9. Reporting and Whistleblowing

Any individual who suspects modern slavery or human trafficking in connection with SeenEm[®] 's business or supply chains is encouraged to report concerns immediately.

Reports may be made confidentially and without fear of retaliation. All concerns will be investigated promptly, sensitively and appropriately.

10. Breaches and Enforcement

Breaches of this policy may result in:



Disciplinary action



Termination of contracts or supplier relationships



Referral to law enforcement or regulatory authorities where appropriate

11. Review and Approval

This policy is reviewed annually by the Board of SeenEm[®] to ensure it remains effective, compliant with UK law and aligned with best practice.

Approved by: The Board of SeenEm[®]

Review frequency: Annual



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