

# MADE TO MEASURE MENTORING LTD ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



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## **1. INTRODUCTION**

1.1. Made to Measure Mentoring Limited (M2M2<sup>®</sup>) is a company registered in England and Wales (Number: 10653662). This procedure also covers all subsidiary companies in M2M2's ownership.

## 2. CONTACTS

Name	Role		Telephone
Sibbald, Duncan (DS)	Compliance Director	duncansibbald @m2m2.co.uk	07776 092 806
Miles, Andy (AM)	MD (Academic)	andymiles @m2m2.co.uk	07730 119958
Robinson, Tony (TR)	MD (Commercial)	tonyrobinson @m2m2.co.uk	07495 006485
Robinson, Peter (PR)	Chairman	peterrobinson @m2m2.co.uk	07831 161523

## **3. POLICY STATEMENT**

- 3.1. Made to Measure Mentoring Limited (M2M2) has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operation and supply chain. This policy sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during our normal working practices.
- 3.2. We will uphold all laws relevant to countering modern slavery and human trafficking, in all the jurisdictions in which we operate.

## 4. ABOUT THIS POLICY

- 4.1. The purpose of this policy is to:
  - 4.1.1. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking issues; and



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- 4.1.2. provide information and guidance to those working for and on our behalf on how to recognise and deal with modern slavery and human trafficking issues.
- 4.2. In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- 4.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 5. WHO MUST COMPLY WITH THIS POLICY

5.1. 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, sub-contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

#### 6. SUB-POLICIES

- 6.1. Whistleblowing: We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- 6.2. Code of Conduct: Our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

## 7. SUPPLIER DUE DILIGENCE

- 7.1. M2M2 conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:
  - 7.1.1. Assessing risks in the provision of particular services
  - 7.1.2. Auditing the suppliers, and their health and safety standards, labour relations and employee contracts







- 7.1.3. Requiring improvements to substandard employment practices
- 7.1.4. Sanctioning suppliers that fail to improve their performance in line with our requirements.
- 7.2. We require all suppliers to attest that:
  - 7.2.1. They don't use any form of forced, compulsory or slave labour
  - 7.2.2. Their employees work voluntarily and are entitled to leave work
  - 7.2.3. They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
  - 7.2.4. They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
  - 7.2.5. They don't require employees to surrender their passports of work permits as a condition of employment.

#### 8. THE REPORTING OF ANY BREACH OF THIS POLICY

To report any perceived or actual breach of this policy, you are required to contact:

The Compliance Director At the M2M2 office address Here

## 9. POLICY REVIEW

9.1. This policy is kept under regular review. The latest review date is published on our website at https://m2m2.co.uk/company-policies

oaching Council







# **10. SIGNATURES**

Name	Signed	Role				
Miles, Andy (AM)	ANA	Director				
Robinson, Tony (TR)	A.A.	Director				
Robinson, Peter (PR)	Refer Phinson	Director				
Sibbald, Duncan (DS)	TSUL.	Director				
Made to Measure Mentoring Limited						



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