



# Slavery and Human Trafficking Statement

## Introduction

This statement is made pursuant to s54 Modern Day Slavery Act 2015 and is Gentoo's Slavery and Human Trafficking Statement for the financial year ending March 2016. This statement applies to S. A. Associates.

## Our Structure and Business

S. A. Associates is a training company that trains more than 12,000 delegates per year. We believe that by putting people we can focus on delivering an outstanding service to our customers and as a responsible business, we pride ourselves on inspiring people to make a difference. We collaborate with key partners and other training associations to influence things that affect our colleagues, customers and society.

## Our policies in relation to slavery and human trafficking

We take a zero-tolerance approach to human trafficking and slavery, in any part of our business.

## Employee policies

S. A. Associates recognises the potential for slavery and human trafficking to affect employees working within its business.

To ensure its employees are not subject to undue influence and are treated with dignity and respect, S. A. Associates has robust HR policies and procedures in place across its operations. These are regularly audited to ensure compliance with employment legislation and prevent unethical working practices. S. A. Associates is committed to ensuring that all

staff receive fair remuneration for the job they perform and undertakes regular reviews of terms and conditions across the workplace.

#### Our supply chains

S. A. Associates procures a range of goods and services via a diverse and varied supply chain, including but not limited to the following:

- Communications and IT equipment services
- Various professional services
- Office equipment and supplies

#### Supply chain policies on slavery and human trafficking

Our policies as detailed above are shared with our Supply Chain and it is requested that they read and commit to these policies.

As part of our initiative to identify and mitigate risk, we now require our Supply Chain, as part of our tender procedures, to answer questions targeted at slavery and human trafficking risk.

#### Supplier adherence to our values and ethics

We require all of our Contractors to register with their relevant awarding bodies who also capture information in relation to the Modern Day Slavery Act. As part of their registration, the company is asked if they have a policy/statement that sets out the steps their organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of their supply chains or in any part of their own business and to provide any relevant information.

#### Training

All staff have been briefed on the issue of slavery and human trafficking, including how to recognise and deal with it.

Date: 13<sup>th</sup> June 2017

Signed by:

Sue Allum

Director

S A Associates Management Training Limited