



Valu-Trac Investment Management Limited

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Modern Anti-Slavery and Human Trafficking Policy

Responsible Executive: Chief Executive Officer

Document Owner: Executive Committee

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Introduction

Section 54 of the Modern Slavery Act 2015 (UK) states that commercial organisations must produce an annual Anti-Slavery Policy Statement every financial year. The criteria are:

- It is a 'body corporate' or a partnership, wherever incorporated or formed
- It carries on a business, or part of a business, in the UK
- It supplies goods or services
- It has an annual turnover of £36 million or more

Valu-Trac Investment Management Limited (Valu-Trac) does not meet this criteria and so has determined that the legislation does not apply to the company at this time.

However, Valu-Trac is committed to combating the risk of modern slavery or human trafficking within its business and its supply chains, this is reinforced by Valu-Tracs Values to deliver the service that we would want to receive. Therefore, while not being legally obligated to provide an annual statement Valu-Trac have produced this Policy document and continue to monitor the threshold and legal requirements.

Policy Definitions

Modern Slavery: is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.

Slavery and servitude: this is where people are dehumanised, treated as a commodity, bought or sold as "property", have restrictions placed on their freedom or are generally exploited for someone else's gain. Slavery often involves Forced or Compulsory Labour.

Forced or Compulsory Labour: this is where someone is forced to work, or is otherwise controlled by an "employer", through coercion, mental or physical abuse, or the threat of abuse.

Human trafficking: relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

Policy Statement

1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which, have in common, the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Modern slavery is a global phenomenon that is both inter and intra-national, affecting an estimated 45 million people worldwide. There is no typical victim, though it is often more prevalent amongst the most vulnerable, and within minority or excluded groups.
2. Valu-Trac has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and will continue to assess the need to implement and enforce effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives,

suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.

4. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Policy Responsibility

Department/Individual	Responsibilities
Valu-Trac Board of Directors	<p>The Valu-Trac Board is responsible for approving this policy and any changes recommended by the relevant committees/departments.</p> <p>The Valu-Trac Board has responsibility for approving the annual Modern Slavery statement, should it be required.</p>
Audit Committee	<p>The Audit Committee must assess the requirement to produce an annual statement within 6 months of the financial year end.</p> <p>The Audit Committee must review this policy and related annual statement and recommend it for approval by the Valu-Trac Board at least once a year.</p>
Executive Committee	<p>The Executive Committee must review this policy and its effectiveness and send its recommendations to the Audit Committee at least once a year.</p> <p>Executive Board Directors have responsibility for monitoring risk in their areas and implementing effective mitigations.</p> <p>Executive Board Directors have responsibility for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains</p>
Staff	<p>Everyone is responsible for acting ethically and with integrity, and raising any concerns related to modern slavery in the scope of their work.</p> <p>Staff are invited to comment on this policy and suggest ways in which it might be improved.</p>

Policy Compliance

1. You must ensure that you read, understand, and comply with this policy.
2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or in partnership with us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. The consequences of failing to effectively manage modern slavery risk can be significant from a regulatory and reputational perspective as well as the obvious human impact.

3. You must notify your manager or contact the Whistleblowing Champion as soon as possible if:
 - you believe or suspect that a breach of this policy has occurred or may occur in the future,
 - you have any concern or suspicion that may be an issue in respect of modern slavery in any part of our business, or within the supply chains of any third-party suppliers; and / or
 - you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our own business or any part of our supply chains constitutes any of the various forms of modern slavery.
4. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment by reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains.
5. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Executive immediately. If the matter is not remedied, and you are an employee, you should raise it formally in line with our Grievance Policy.

Policy Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Breach of this policy may lead to prosecution under the Modern Slavery Act 2015.

Relevant Legislation, Standards and Guidance:

External Links

[Modern Slavery Act 2015](#)

[Modern Slavery Helpline](#)

Internal Related Policies

These are available to staff via the Skillcast Policy Hub.

HR4. Whistleblowing Policy

HR14. Code of Conduct & Disciplinary Policy