

# Modern slavery and prevention of hidden labour exploitation

## COMPANY STATEMENT

Luxus Ltd does not fall into a category that requires it to publish an annual modern slavery statement however Luxus Ltd is committed to developing and adopting a proactive approach to tackling hidden labour exploitation and fundamentally opposes any form of labour exploitation of job applicants, workers or agency workers by any company, individual or group of individuals. The company is committed to acting ethically and with integrity with all business relationships, inclusive of companies or individuals supplying goods and/or services to Luxus Ltd; and aims to collaborate with the Gangmaster Labour and Abuse Authority, Stronger Together and local authorities to ensure systems are adopted to help eliminate all forms of labour exploitation throughout our supply chain.

Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gang's other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. This includes forced labour and human trafficking for labour exploitation, payment for work finding services and work-related exploitation such as forced use of accommodation. In essence, it constitutes as any act in which by one person/group of people deprives another of their liberty in order to exploit them for personal or commercial gain.

The company recognises that labour exploitation is often well hidden by the perpetrators and victims rarely see themselves as such and are often reluctant to come forward for help. The company also recognises all the following as act of exploitation:

- Child trafficking – anyone under the age of 18 moved so they can be exploited.
- Sexual exploitation – anyone forced to perform non-consensual or abusive sexual acts against their will.
- Forced labour – anyone forced to work against their will.
- Deb bondage – anyone forced to work whose debts to another person restrict their mobility.
- Criminal exploitation – anyone forced into crime against their will.
- Domestic servitude – anyone forced to carry out housework in a domestic home for little or no pay.
- Payment for work – paying a person(s) to find work in the UK is against the law.

This ensures that the Company fulfils this obligation, it will ensure that it conducts a thorough process of due diligence to investigate its employment of staff, as well as that of its service suppliers, as detailed in the procedure below.

## COVERAGE



This applies throughout Luxus Ltd, at all sites and to all employees along with those engaged in work on behalf of Luxus Ltd.

## RESPONSIBILITY

Ultimately the responsibility for modern day slavery and relevant policies lie with the Directors of the Company.

The daily practical management of the procedure to these policies is the responsibility of the HR and Line Managers.

Luxus Ltd shall:

- Ensure that all pricing of the Company's produce is managed to warrant that labour costs are budgeted for as by way of accepting that recruitment fees are a business cost and job applicants will not be charged for any type of temporary or permanent work.
- Select trusted and competent staff members to control the processes of labour sourcing, recruitment, and worker placement.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the GLAA and the police. The HR Manager will be the key principle in reporting such suspicions and will be responsible building a report the relevant authorities.
- Encourage workers to report cases of hidden third-party labour exploitation through the Company's whistleblowing policy.
- Take a proactive approach to encouraging workers and agency workers to report any known acts or suspicion of hidden exploitation within their communities and shall facilitate this by providing the relevant information to do so for the GLAA, Modern Slavery Helpline, Migrant Help, The Salvation Army and the police.
- Ensures the Company maintains a victim centred approach throughout all its policies and procedures and supports those responsible for modern day slavery within the company, through training, to apply this in practice.
- Will engage in forming relationships with local and national support networks for victims of modern-day slavery.
- Only trade with labour providers whose policies and procedures are in line with Luxus Ltd.'s policy on the prevention of Hidden Labour Exploitation.