

Modern Slavery Statement

“Standing Firm Against Modern Slavery: Upholding Dignity and Freedom for All”



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Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that 3Way has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. At 3Way, we are committed to acting ethically, with integrity and transparency in all business dealings. This includes having effective systems and controls to safeguard against any form of forced labour taking place within the business or our supply chain.

Our business

We provide services to various customer facilities, such as offices, distribution centres, warehouses, medical facilities, schools, and high-end retail boutiques. We focus on our people and our values are: Teamwork, Openness, Accountability, Integrity and Dignity. We believe in honest and open communication throughout the business.

We are members of Slave-Free Alliance and the Living Wage Foundation, which demonstrates our commitment to ethical and responsible business practices. We recognise our responsibility to respect and uphold the human rights of our employees, contractors, suppliers, customers and other stakeholders.



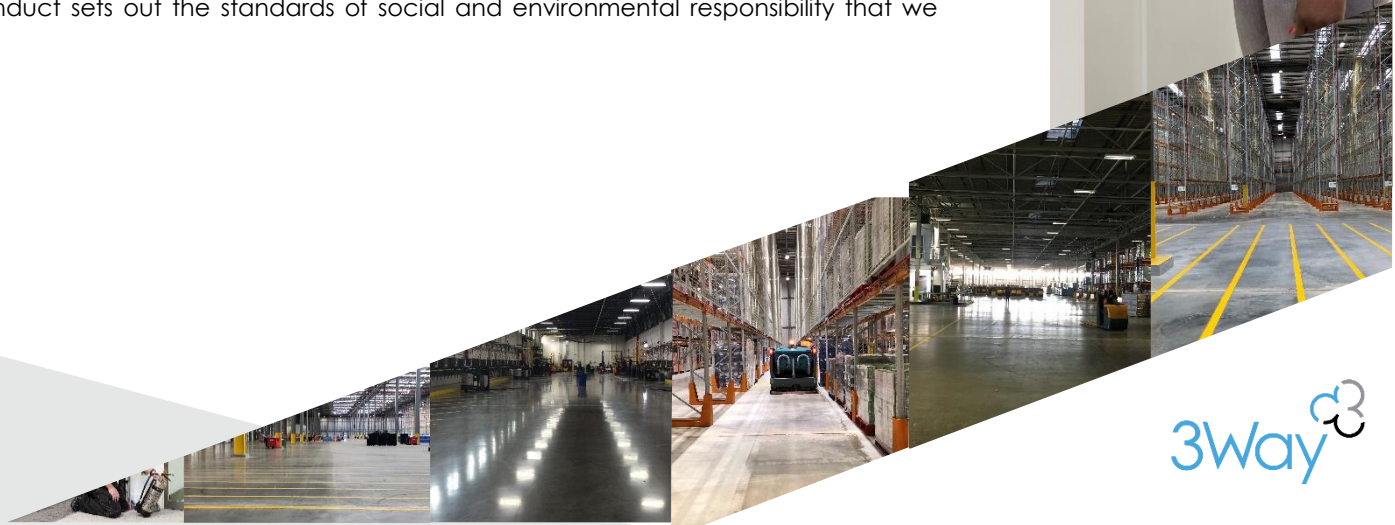
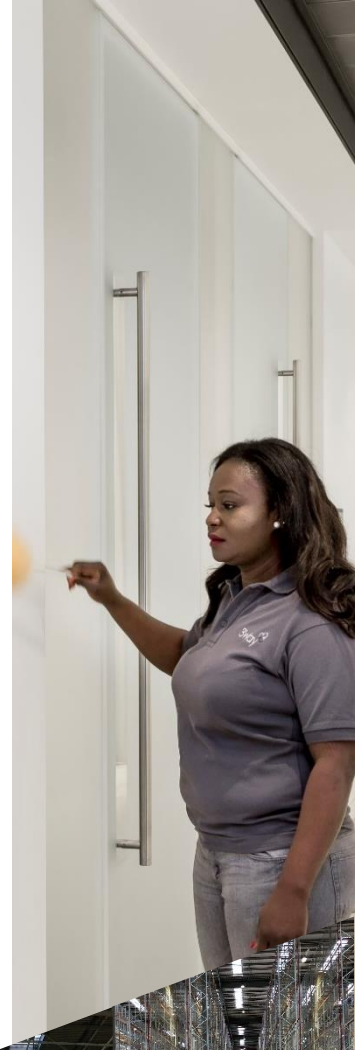
Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- ☞ **Anti-bribery and corruption policy** – 3Way's zero tolerance on accepting and giving bribes.
- ☞ **Bullying and harassment policy** – 3Way's zero tolerance on bullying and harassment in the workplace.
- ☞ **Equal opportunities policy** – 3Way's commitment to having an equal and diverse workforce.
- ☞ **Training and development policy** – 3Way's commitment to train and develop its workforce.
- ☞ **Young person's policy** – Ensures that young people are able to work safely in the workplace.
- ☞ **Privacy statement** – How we collect and treat personal information, and how it is stored.

3Way also has a Modern Slavery Policy, which outlines our principles and procedures in preventing modern slavery in our operations and supply chain. It references how our employee and supplier codes of conduct, as well as policies concerning recruitment, remuneration, working hours, health & safety, grievances and whistleblowing all contribute to combatting the issue of modern slavery and labour exploitation.

3Way is committed to preventing modern slavery and human trafficking in all its forms within our business and supply chain. We also strive to minimise the environmental impact of our operations and to promote sustainability in our industry. We expect our suppliers and contractors to share our values and standards and to act with integrity, honesty, and respect for human rights and the environment at all times. Our supplier code of conduct sets out the standards of social and environmental responsibility that we expect from our suppliers and contractors.



Due diligence process

3Way operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the organisation has never been convicted of offences relating to modern slavery, or in instances of links to wider human rights abuses, confirmation is sought that effective remedial action has taken place. Our modern slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- ❸ They have taken steps to eradicate modern slavery within their business.
- ❸ They hold their own suppliers to account over modern slavery.
- ❸ They pay their employees at least the national minimum wage.

Our preferred supplier questionnaire also asks the business how they certify that all materials incorporated into, and items procured were sourced, processed, and manufactured ethically.

We may terminate the contract at any time should any instances of modern slavery come to light.



Our risks

We keep apprised of the latest modern slavery risks both in our industry in the UK, as well as the parts of the world that form part of our supply chain. We do this by attending webinars and sessions delivered by our partner Slave-Free Alliance including how to conduct effective modern slavery risk assessments and due diligence.

For our employees, we have strict recruitment guidelines in place and conduct rigorous document checks to ensure that candidates have the right to work in the UK, and that documents are genuine. We also ensure that no unknown third-parties are involved in the applicants recruitment process, and we conduct regular reviews on our internal HR systems to ensure that there are no duplicate records which may be indicative of exploitation.

We further mitigate risks by ensuring that our suppliers have their own modern slavery policies in place.

Effectiveness

We monitor and evaluate the performance of our policies and procedures regularly to ensure their effectiveness and compliance. We use the following methods to measure our progress:

- ⌘ We conduct internal audits and inspections on our business operations and facilities to check for any signs or risks of modern slavery or human trafficking.
- ⌘ We conduct external audits and assessments on our suppliers and contractors to verify their compliance with our standards and expectations.
- ⌘ We collect feedback from our employees, customers, suppliers, contractors, and other stakeholders through surveys, interviews, meetings, or other channels.
- ⌘ We review any reports or complaints of modern slavery or human trafficking that we receive through our whistleblowing policy or other channels.
- ⌘ We report on our actions and achievements in preventing modern slavery or human trafficking in our annual statement under the Modern Slavery Act 2015.



Training

We provide training and awareness-raising programmes for our employees and managers on the risks and indicators of modern slavery and human trafficking.

We also regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Our area supervisors conduct regular audits of our contracts to ensure that the correct level of service and the correct screened employees are being provided.

Next steps

We have collaborated in the production of a three-year modern slavery action plan in partnership with Slave-Free Alliance and, will be looking to build on the progress already made in our efforts to combat modern slavery and human rights abuses in our operations and supply chain.

This year and beyond, we will consider publishing an escalation policy, developing our supplier questionnaire, identifying how we can further implement modern slavery awareness into our employee induction programme.

Approved by:

Date: 22nd January 2024

