

Performance indicators

The Group has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Group is:

- requiring all senior managers, supply chain managers and HR professionals to undertake training on modern slavery.
- updating its system for supply chain verification, whereby the Group evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the Group will re-evaluate all existing suppliers in light of the Modern Slavery Act 2015.

Training

The Group requires senior managers, supply chain managers and HR professionals within the Group to complete training on modern slavery as a module within the Group's wider human rights/ethics/ethical trade training programme.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Group should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Group's supply chains.

Awareness-raising programme

As well as training staff, the Group has raised awareness of modern slavery issues by circulating a series of emails to staff and publishing articles in the staff newsletters.

The information circulated explain to staff:

- the basic principles of the Modern Slavery Act 2015;