

## MODERN SLAVERY STATEMENT

### 1. Policy Statement

We are committed to the highest level of ethical standards and sound governance arrangements and set high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of our activities.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships and ensuring modern slavery is not taking place anywhere in our business or in any of our supply chains.

We fully support the government's objectives to eradicate modern slavery and human trafficking.

### 2. Responsibilities

Under the 2015 UK Modern Slavery Act, only businesses with over £36m in annual turnover conducting business in the UK are required to publish a slavery and human trafficking statement. We will not, therefore, be producing an annual statement.

However, we will refer to this policy as a due diligence guide for our business and supply chain activities and will ensure that our employees are aware of the responsibilities inferred by the Modern Slavery Act and its impact on their duties.

This policy applies to everyone working for or on behalf of the ATC in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### 3. Management Responsibilities

The ATC Leadership Team undertakes to annually review this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:

- Assessing and interpreting any recent or emerging case law and best practice;
- Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.

### 4. Supply Chains

We contract with suppliers for goods and services on our own behalf. We may also be engaged with contracts and suppliers that service specific projects commissioned by, or on behalf of, members, partners and associated research institutes.

Where we directly contract goods or services we will assume responsibility for due diligence. Where we are not the contracting party but are in receipt of those goods or services we will require the contracting party to evidence due diligence on request.

Our main geographical area of operation is the UK, though we will, from time to time, participate in European and International opportunities.

## 5. Areas of Risk

**Risk 1:** The primary risk is an association with a Delivery Partner, Framework participant or company with an ambiguous or non-compliant supply chain.

Mitigation: ATC will therefore ensure that contracting and tendering processes include the requirement for delivery partner compliance statements. We expect all Delivery Partners, organisations within our membership and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2015; and are
- Transparent, accountable and auditable; and are
- Free from ethical ambiguities.

**Risk 2:** Employees may not fully understand the requirements of the act or its impact on their day to day duties.

Mitigation: We will:

- Remind employees of our obligations under the Act.
- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed-back lessons learnt into the compliance risk management process.

## 6. Reporting

If any relevant Party believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or the CEO or report it in accordance with ATC's whistleblowing policy as soon as possible.

## 7. Review

This statement will be reviewed every 18-24 months or sooner if changes to legislation come into effect.

## 8. Version Control

Version	Date	Author	Change	ATC Approval	Approval Date
1.0	1/4/24	S Clarke	ATC Combined Policy	DRAFT	