



Wellbeing and Progression for Developers

# Modern Slavery and Anti-Trafficking Policy

V1.3 Last reviewed/updated 15th May 2021

## Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

The Coders Guild have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020.

The Coders Guild establishes a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Promoting inclusion, diversity and equality through expert training, coaching and CPD opportunities for software development.

A safe space offering community-driven, peer-reviewed and open-source knowledge share.



## Risk assessment

Annually we undertake a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
  - The business services rendered by the suppliers
  - The presence of vulnerable demographic groups
  - A news analysis and the insights of labour and human rights groups
- This assessment will determine our response and the risk controls that we implement.

## Policies

The Coders Guild operates a Whistleblowing Policy which encourages all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistleblowers.

Via our robust inductions, we encourage all staff, associates and Learners to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of conduct and ethical behaviour when operating and managing our supply chain.

## Supplier due diligence

The Coders Guild conducts due diligence on all new suppliers during onboarding and of existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

## Awareness

The Coders Guild has raised awareness of modern slavery issues by ensuring all employees and apprentices receive information on the Modern Slavery Act during induction and onboarding and know where to access our policies. We explain:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## Training

In addition to the awareness programme, The Coders Guild ensure all staff and apprentices know how to access further information and are signposted to further information and training to cover specific topics such as:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps The Coders Guild will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by The Coders Guild's anti-slavery policy
- Measuring how we're performing

The Coders Guild has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out an ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?