



## MODERN SLAVERY POLICY

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Approved by:	Board
Executive Responsible:	Finance and Compliance Director
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## **1. PURPOSE AND KEY PRINCIPLES**

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). The Act imposes obligations on organisations of a certain size which carry on a business in the United Kingdom. Modern slavery can occur in various forms, including 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. BHC has adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term ‘modern slavery’ has the meaning given to that term in the Act.
- 1.2 This policy applies (a) to all employees, officers and directors of BHC (b) to agents, vendors, contractors, representatives, advisors and other third parties acting on behalf of BHC and (c) to contractors and suppliers of goods and/or works or services to BHC.

## **2. POLICY STATEMENT**

- 2.1 BHC is fully committed to supporting the Act and will not knowingly engage with any business that is in contravention of the Act. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all of our contractors, suppliers and other business partners.
- 2.2 On the basis of our due diligence and analysis of our supply chains, we consider that BHC is currently at low risk of slavery and human trafficking in the context of our own business.
- 2.3 Although Belfast Harbour Police may provide the initial response to an incident, pursuant to the Modern Slavery Act 2015, Section 27, Schedule 2, Part 3, the Port Authority does not have responsibility for investigating any incidents of Modern Slavery, perceived or actual, which is the responsibility of the relevant specialist unit of the Police Service Northern Ireland. However, Belfast Harbour will endeavour to work in a fully cooperative manner with any authorities investigating a Modern Slavery incident.

## **3. PREVENTION OF MODERN SLAVERY**

- 3.1 In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall:
- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness, re-assessing at least biennially;
  - engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Act, at all times;

- incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and,
- provide training to relevant employees to facilitate achievement of the objectives of this policy.

## **4. ROLES AND RESPONSIBILITIES**

4.1 BHC's management has overall responsibility for this policy. The key roles and responsibilities within BHC in relation to this policy are as follows:

### **4.2 Board**

- Determination of corporate policy in respect of the Act (i.e. this policy), and
- Approving the annual statement required by the Act.

### **4.3 Audit & Risk Committee**

- Supporting the ongoing implementation of this policy which may include regular review of the internal control framework and controls identified as being needed to drive compliance with this policy.

### **4.4 Management**

- Day-to-day operational responsibility for the implementation of this policy,
- Allocating sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness,
- Ensuring that all managers and other staff who may deal with concerns or investigations under this policy receive appropriate training, and
- The Finance and Compliance Director is responsible for operating and maintaining internal control systems to prevent the occurrence of modern slavery in our supply chains.
- The People and Corporate Services Director is responsible for operating and maintaining internal control systems to prevent the occurrence of modern slavery in the recruitment, selection and employment of employees or other persons engaged via agencies to provide services for BHC.

### **4.5 Employees (and third parties working for us or under our control)**

- Conducting business in a manner such that the opportunity for any incidence of modern slavery is prevented,
- Avoiding any activity that might lead to, or suggest, a breach of this policy, and
- Reporting any suspected incidents of modern slavery to BHP immediately.

## **5. REPORTING INCIDENTS**

- 5.1 Employees (and agency staff, trainees, external consultants and contractors working with BHC) are encouraged in the first instance to immediately report any suspected wrongdoing to their Head of Department who will raise the matter with the Finance and Compliance Director.
- 5.2 Alternatively, employees can raise the matter using the **BHC Whistleblowing Policy**, which is available on the BHC Intranet.
- 5.3 Belfast Harbour Police shall be informed of any such suspected wrongdoing.

## **6. POLICY VIOLATION**

- 6.1 An employee or contractor involved in a wrongdoing in breach of this policy may:
  - face employee disciplinary procedures, which may in turn result in penalties being imposed on that employee (up to and including dismissal).
  - be reported to the relevant person's employer which may in turn result in the termination of the service contract with the contractor, contracting company, or agency worker. BHC may also take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the employee / contractor and/or other individuals concerned.

## **7. REVIEW OF POLICY**

- 7.1 Following its initial adoption, this policy will be reviewed on a triannual basis. It may be revoked, replaced or changed at any time. Staff will be informed of any material changes made to the policy.