

# Anti-slavery and Human Trafficking Policy

Version 1.4

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## Version Control

*Note: minor updates increase version number by 0.1, major updates increase version number by 1.0.*

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## 1. Introduction

**Radian Group** refers to, Radian Group Limited, the parent company and all of its subsidiary companies which, for the avoidance of doubt includes Yarlington Housing Group and its subsidiaries.

- 1.1 Radian Group has a zero tolerance approach to modern slavery across all areas of the organisation, as well as in our supply chains. Radian Group is committed to ensuring we are not connected to modern slavery in any way. Our aim is to ensure that our business operates in an open and transparent way and our approach to tackling modern slavery throughout our supply chains is consistent with our obligations under the Modern Slavery Act 2015.
- 1.2 Modern slavery is a crime and violation of fundamental human rights. It takes various forms, including slavery, compulsory labour and human trafficking for exploitation and can have a significant adverse impact on individuals and their family members across the world.
- 1.3 We aim to work in partnership with all our contractors, suppliers and other business partners to ensure that they share and work towards the same values we hold against slavery and human trafficking. To manage this, and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We also require our suppliers to confirm their compliance with Modern Slavery Act 2015.
- 1.4 We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 1.5 This policy applies to all persons working for us or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners. All colleagues must ensure that they have read, understand and comply with this policy.

## 2. Responsibility for this policy

- 2.1 The Group Combined Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 2.2 The Procurement Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries arising and

auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### **3. Compliance with this policy**

- 3.1 As part of our initiative we have in place systems to:

- 3.1.1 Identify and assess potential risk areas in our supply chains;
- 3.1.2 Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- 3.1.3 Monitor potential risk area in our supply chains; and
- 3.1.4 Protect whistle blowers

- 3.2 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy. Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage.

- 3.3 If a colleague believes or suspects a breach of this policy has occurred or there is a risk of a breach occurring, they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.

- 3.4 We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery, in whatever form, may be taking place in any part of our organisation or in our supply chains. Detrimental treatment includes dismissal, disciplinary action, threat or other unfavourable treatment connected with raising a concern. If a colleague believes that they have suffered any such treatment, they should inform HR immediately. If the matter is not remedied, a colleague should raise it formally using our Grievance Procedure.

### **4. Training and awareness**

- 4.1 We are committed to providing training on this policy and on the risks our organisation faces from modern slavery. Training on this policy is an integral part of the induction process for new colleagues and regular training will be provided as necessary.

- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationships with them and reinforced as appropriate thereafter.

## **5. Breaches of this policy**

- 5.1 Any breaches of this policy will be dealt with in accordance with our disciplinary policy and procedure and could be deemed as a gross misconduct offence.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they break this policy.

## **6. Slavery and human trafficking statement**

- 6.1 Organisations with a joint annual turnover exceeding £36 million must publish a statement to demonstrate the steps they are taking to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.
- 6.2 Radian Group will publish a statement setting out the steps it will take during year one and it will be reviewed annually and be published on the company's external website. It will include the following:
  - 6.2.1 The organisation's structure, its business and its supply chains;
  - 6.2.2 Its policies in relation to slavery and human trafficking;
  - 6.2.3 Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
  - 6.2.4 The part of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
  - 6.2.5 Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measure against such performance indicators as it considers appropriate;
  - 6.2.6 The training about slavery and human trafficking available to its staff.
- 6.3 The Procurement Manager is responsible for preparing the statement annually, each June, which will be presented to the Board for approval.

## **7 Review**

- 7.1 Radian Group will keep under review the arrangements for slavery and human trafficking, taking into account good practice. This Policy will be subject to review during Year One, and every three years subsequently, or more frequently if there is a legislative or regulatory need to do so.