

## **Anti Slavery and Human Trafficking Policy**

### **Zed Pods Ltd**

#### **1. Policy Statement**

Zed Pods is committed to preventing modern slavery and human trafficking in all parts of our business and supply chain. We have a zero-tolerance approach to slavery, forced labour, and human trafficking, in line with the Modern Slavery Act 2015.

All organisations with a UK turnover exceeding £36 million have a legal duty to publish an annual statement which outlines their commitment to this issue. Whilst ZED PODS Ltd, Under the terms of the Modern Slavery Act, are not currently required to reporting under the act, we have an internal Modern Slavery Policy and onboarding process for sub-contractors.

Modern Slavery is an international crime affecting 330 million people around the world. There are different types of modern slavery, but the key definition of a person in slavery include:

- A person owned or controlled by an employer
- A person who has been dehumanised, treated as a commodity, or brought and sold as property
- A person who is physically constrained or has physical restrictions on their movement
- A person forced to work through threat.

This policy sets out our commitment to ethical business practices and provides guidance to employees, contractors, and suppliers on how to identify and report concerns.

#### **2. Scope**

This policy applies to:

- All employees, directors, and managers (permanent, temporary, or agency)
- Subcontractors, suppliers, consultants, and other third parties
- All projects, including design, manufacture, and installation of modular housing units

It covers practices including:

- Forced labour or coercion
- Human trafficking
- Exploitation of workers through unfair wages or unsafe working conditions
- Complicity in modern slavery by partners or suppliers

#### **3. Our Commitment**

Zed Pods will:

- Conduct Business Ethically – Ensure that all operations, procurement, and employment practices comply with the law and uphold human rights.
- Supply Chain Due Diligence – Assess and monitor suppliers and subcontractors to ensure they also meet anti-slavery standards.
- Training and Awareness – Provide training to employees and relevant stakeholders to recognise the signs of modern slavery.
- Reporting and Whistleblowing – Encourage employees and contractors to report concerns in confidence through our Whistleblowing Policy.
- Continuous Improvement – Review and update policies and procedures regularly to mitigate the risk of modern slavery in our business.

#### 4. Responsibilities

##### All Employees

- Must comply with this policy and report any suspicions or evidence of slavery or human trafficking.
- Should be vigilant for signs of exploitation among colleagues, contractors, or supply chain partners.

##### Management and Directors

- Ensure compliance with this policy across all departments.
- Undertake due diligence when engaging suppliers or contractors.
- Provide resources and training for employees on anti-slavery practices.

##### Supply Chain Partners

- Must adhere to this policy as a condition of engagement.
- Must notify the company immediately if any incident of modern slavery is suspected or detected.

#### 5. Spotting the Signs of Modern Slavery

Victims of modern slavery can be unwilling to come forward and may fear reprisal. We have a key role to play in preventing it by identifying and supporting potential victims of modern slavery. The following are some of the common signs to be aware of

- Physical appearance – Victims may show signs of physical or psychological abuse or appear withdrawn
- Isolation – victims will often not travel on their own, seem under control of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- Few or no personal effects – Victims may have no identification documents, have few personal possessions and always wear the same clothes
- Restricted freedom of movement – victims have little opportunity to move freely and may have had their travel documents retained.
- Unusual travel times – They may be dropped off or collected at work on a regular basis either very early in the morning or late at night
- Reluctant to seek help – victims may avoid eye contact, appear frightened or hesitant to talk to strangers, and fear law enforcement for many reasons, such as not knowing who to trust or where to get help.

#### 6. Reporting Concerns

Concerns may be reported through the following channels:

- HR Manager:  
Name: Connie Jenion  
Email: [connie@zedpods.com](mailto:connie@zedpods.com)  
Phone: 07828443179
- Concerns can also be raised anonymously.
- Where appropriate, serious issues may be reported to external authorities, such as:
  - National Crime Agency (NCA)
  - Modern Slavery Helpline [08000 121 700](tel:08000121700)
  - Local police or regulatory bodies



In emergency situations, you should always contact the Police, but remember, if there is a suspicion that slavery is occurring you should not attempt to confront the issue directly. You need to ensure the safety of the victim and your own personal safety in these situations. All reports will be treated confidentially and investigated promptly.

## 7. Due Diligence and Risk Management

Zed Pods will:

- Include anti-slavery clauses in contracts with suppliers, subcontractors, and consultants.
- Require evidence of ethical labour practices from suppliers and subcontractors in our onboarding process.
- Conduct risk assessments of supply chains to identify potential areas of concern via our supplier onboarding process.
- Monitor and audit suppliers and contractors periodically to ensure compliance.

## 8. Training and Awareness

- All employees, especially those in procurement, HR, and project management, will receive training on recognising and preventing modern slavery.
- Contractors, subcontractors, and suppliers will be informed of this policy and their obligations under it.
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## 9. Monitoring and Review

- We review our supply chain on an annual basis for their modern slavery practices and ensure all have a MSATS style assessment during onboarding and rechecked annually.
- 0% of workforce on 0 hour contracts
- 100% of high risk suppliers identified
- 100% workers have right to work checks upon appointment
- We ensure supply chain have a 100% investigation and remediation rate for any modern slavery or trafficking reports
- We currently have 100% training of all internal staff within the first month of employment and 0 instances of modern slavery or trafficking in our supply chain
- This policy will be reviewed annually, or sooner if legislation changes, to ensure effectiveness.
- Any incidents or identified risks will be recorded, investigated, and corrective actions implemented.


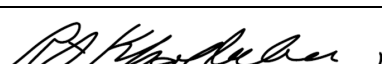
Signature:  ,

Approved by: Rehan Khodabaccus

Version: 2

Date: 1<sup>st</sup> April 2021

Next Review Date: 1<sup>st</sup> April 2026

Reviewer	Date	Signature
Rehan Khodabuccus	1 <sup>st</sup> April 2022	
Rehan Khodabuccus	3 <sup>rd</sup> April 2023	



Rehan Khodabuccus	1 <sup>st</sup> April 2024	<i>PA Khodabuccus</i> ,
Rehan Khodabuccus	1 <sup>st</sup> April 2025	<i>PA Khodabuccus</i> ,
Rehan Khodabuccus	1 <sup>st</sup> April 2026	<i>PA Khodabuccus</i> ,