

Company Name:	Holt Doctors Limited (“the Company”)
Policy Name:	Anti-Slavery Policy
Date adopted:	August 2016
Date of last review:	N/A
Date of next review	August 2019
Version:	v.1

1. Holt Doctors Limited is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Holt Doctors Limited is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Holt Doctors Limited provides appropriate training and awareness information for all of its staff.
In particular:
 - Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake internal training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to our Operations Manager.
5. Reports surrounding these issues are taken extremely seriously by senior leadership team, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
 - The percentage of workers and/or candidates supplied from our preferred supplier list,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
 - We would also recommend reading this in conjunction with our other policies, including our Anti-bribery / corruption policy.

This policy was adopted on **25th August 2016** after being agreed by our board of directors. It is reviewed annually.