



Modern Slavery Policy

Pinnacle Group

Introduction

Pinnacle Group places a high value on people and we are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. We have a zero tolerance approach to modern slavery and are committed to acting ethically and with integrity in all of our business transactions.

Purpose

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of Pinnacle Group with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

Scope

This policy document provides an overview of zero-tolerance approach to modern slavery.

The procedures and responsibilities apply to all staff, including senior managers and directors, paid staff, volunteers and session workers, agency staff, students or anyone working on behalf of any part of the Pinnacle Group, such as sub-contractors or consultants.

Violation or disregard for the commitment and responsibilities within this policy will be taken seriously and dealt with promptly through employee or supply chain management protocols as applicable.

Our Approach

We are committed to ensuring there is transparency in our own business and we expect the same high standards from all of our contractors, suppliers and other business partners.

To underpin compliance with the Act we intend to implement the following measures:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focussed on those areas.
- Engage with key suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and request that they adhere to the code of conduct attached as Schedule 1 to this policy.



- Add provisions to the supplier pre-screening process to ensure that suppliers are able to demonstrate safeguarding controls and awareness of their obligations under the Act.
- Accept contractual provisions from our clients to confirm our compliance with the Act and ensure that our key suppliers accept the same where applicable.

Any employer with any concerns whatsoever regarding the conduct of others relating to modern slavery should report such concerns immediately using the whistleblowing policy, directly to HR or may call the national Modern Slavery Helpline on 0800 0121 700.

This policy is reviewed annually by the Group Commercial and Legal Team.



Schedule 1

Modern Slavery Act Code of Conduct

Whilst working for, or on behalf of Pinnacle Group, an approved supplier must adhere to the following provisions:

1. Forced or Involuntary Labour

Workers will not be subject to any form of forced labour. All work must be voluntary and workers shall have freedom to terminate their employment at any time without penalty, given notice of reasonable length

2. Recruitment Fees

Workers shall not be charged any fees or costs for recruitment, including costs associated with travel, processing official documents and work visas in both home and host countries.

3. Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documents (eg: passports) is strictly prohibited. The retention of personal documents shall not be used as a means to bind workers to employment or to restrict their freedom of movement.

4. Contracts of Employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution are strictly prohibited.

5. Deposits

Migrant workers shall not be required to lodge deposits or security payments at any time.

6. Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment.

Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including mental or physical coercion, or verbal abuse of workers. Nor shall they result in wage deductions, reductions in benefits, or compulsory labour.

Threats of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates is strictly prohibited.

7. Workers Equality

All workers shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits and accommodation) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation/disclosure to authorities to coerce them into taking up or maintaining employment.



8. Wages and Benefits

All workers shall be paid at least the national living wage and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals, directly to workers and shall not be delayed, deferred or withheld. Only deductions, advances or loans authorised by national law are permitted with the full consent of the worker. Clear and transparent information shall be provided to workers about hours worked, rates of pay and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employer or their jobs.

9. Working Hours

Workers shall not be forced to work in excess of the number of hours permitted in national law. Normal working hours and overtime shall not exceed 48 hours per week. No worker shall be made to work overtime under threat of penalty, dismissal or denunciation to authorities. No worker shall be forced to work overtime as a disciplinary measure or for failure to meet production quotas.

10. Freedom of Movement and Personal Freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises nor shall any other coercive means be used to restrict their freedom of movement or personal freedom.

11. Grievance Procedure

An effective procedure shall be established to ensure that any migrant worker, acting individually or with workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

12. Private Employment Agencies

Companies shall hire migrant workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, companies shall ensure their labour agencies are certified or licensed by a competent authority. And that they do not engage in fraudulent behaviour placing the worker at risk of forced labour or trafficking for exploitation.