
Modern Slavery and Anti Trafficking Policy

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015 ('the Act').

Hughes Driver Training Ltd is committed to a zero-tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with Hughes Driver Training Ltd including all its wholly owned companies, contractors, and suppliers.

Hughes Driver Training Ltd acknowledges the risk that a supply chain partner may be involved in the use of a hidden or unknown subcontractor reliant on forced labour. Although Hughes Driver Training Ltd considers the risk of modern slavery to be extremely low, due to the nature of its agreements, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers and the complexity of supply chain(s).
- All supply chain lines are continually risk assessed and managed in relation to modern slavery.
- Hughes Driver Training Ltd encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. Hughes Driver Training Ltd has a whistleblowing policy which can be used to report any instances of modern slavery, which was updated in August 2022.
- Hughes Driver Training Ltd has an equal opportunities policy, and is committed to upholding human rights.
- Hughes Driver Training Ltd will continue to develop its commitment to combat modern slavery and will provide staff training where appropriate.
- Any breaches of this policy may result in Hughes Driver Training Ltd taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.