

EQUALITIES & ANTI-SLAVERY POLICY

REVIEW OF SAFETY POLICY

This policy will be reviewed annually by the company and any revision of it will be advised to every employee, contractor and sub-contractors.

Gomolemo Makolomako
LIBA Decorative Solutions Ltd

Date of revision
19th July 2019

Monitoring of job applicants, successful applicants, trainees, grievances, promotion, dismissal, etc. will be monitored by this policy.

Reviews of the policy and implementation of any changes will be documented and dated.

The policy was approved on 20th June 2019, following a consultation with senior management. Ms Makolomako has overall responsibility for the effectiveness of this policy.

AUTHORISED BY: Ms Makolomako

SIGNATURE: 

Position: Managing Director

Date: 19 July 2019

REVIEW DETAILS: Reviewed Annually

NEXT REVIEW DETAILS: 19 July 2020

This policy arrangement is endorsed and authorised and approved by LIBA company executives and will be reviewed annually or when necessary if regular or serious incidents arise that suggest it needs to be revisited.

ANTI SLAVERY POLICY

Policy Statement

The Directors of LIBA can categorically state that the practice of modern slavery is not only a criminal act but is immoral, unethical and a violation against basic human rights. Modern slavery can manifest itself in numerous ways including enslavement, forced labour, compulsory withholding of financial rewards and human trafficking. The aim with these activities is the deprivation of personal liberty and exploitation of an individual for personal gain.

LIBA has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business dealings and relationships. This will be achieved by implementing and enforcing effective systems and controls to ensure modern slavery does not occur anywhere in our operations or supply chain. The Directors are also committed to ensuring transparency in all of the LIBA business activities and to ensure modern slavery does not occur in any of our supply chains. This will be consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect these same standards from all our sub-contractors, suppliers and other business partners. In this regard, these stakeholders are expected to comply fully with our Supply Chain Modern Slavery Act Commitment Statement which forms an integrated part of our contractual relationship with them.

The scope of this Policy applies to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, sub-contractors, agents, external consultants, third party representatives and business partners.

Responsibility for the Policy

- The Directors of LIBA have overall responsibility for ensuring that this Policy complies with all legal and ethical obligations as well as ensuring that all employees, our procurement and supply chain comply with it.
- The Human Resources Manager has primary and day to day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it and periodic auditing of relevant internal control systems and procedures to ensure they are effective in countering modern slavery.
- Management at all levels are responsible for ensuring those who report to them understand and comply with this Policy by way of adequate and regular training on it and the issue of modern slavery in operations.
- The Human Resources Manager will be expected to encourage comments, suggestions and queries from employees on the Policy, its implementation and content. This will enable effective review of the document. The LIBA Procurement Manager will seek similar feedback from the supply chain for this Policy review process.

Policy Compliance

All employees, sub-contractors, suppliers and other business partners must:-

- Take the time to ensure they read, understand and comply with this Policy;
- Prevent, and report the detection of modern slavery in any part of the LIBA business or its supply chains;
- Avoid any activity that might lead to or suggest a breach of this Policy;
- Raise concerns with a line manager or director if a breach or any issue under this Policy is suspected or believed to have occurred at the earliest opportunity.

It is also Company policy to ensure that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of LIBA business activities. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern under this Policy.

Communication and Awareness of this Policy

During the induction process the training and awareness of this Policy and the risks to the LIBA business from modern slavery in its supply chain must be highlighted for all employees and contractors. Suppliers and business partners will also be made aware of our zero tolerance approach to modern slavery at the outset of our business relationship with them and reinforced appropriately thereafter.

Breaches of the Policy

Any employee who, after investigation, is deemed to be in breach of this Policy will be subject to disciplinary action which may result in his/her dismissal. The business relationship with sub-contractors, suppliers and business partners will be terminated in the event of a breach of this Policy.

Training

We will endeavor to train and provide induction to our staff and operatives on Diversity, Anti-Modern Slavery policy.

Action	Timescale
Continue to inform, educate and encourage our staff & operatives about diversity & modern slavery (using our risk assessments management system)	Ongoing
Ensure that equality and diversity are highlighted and discussed in all induction training sessions	Ongoing
Roll-out an online diversity & modern slavery training programs to our staff & operatives	Dec 2019
Encourage our staff & operatives to engage in community based programs to address any diversity issues	Ongoing
To include diversity as part of our weekly / periodic toolbox talks	Ongoing

AUTHORISED BY: Ms Makolomako Director

SIGNATURE:  19th July 2019