



## Modern Slavery & Human Trafficking Policy

### Our commitment to the principles of the Modern Slavery Act 2015

Capital (Hair & Beauty) Ltd is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal-opportunities employer, Capital is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff.

Capital acknowledges responsibilities towards the Act and continues to ensure transparency within its organisation and with suppliers of goods and services to it. Capital is committed to ensuring there are no acts of modern day slavery and human trafficking within its business and any from within its supply chain, including sub-contractors and partners.

Capital will not knowingly support or deal with any business involved in slavery or human trafficking.

The Directors and senior management of Capital shall take responsibility of implementing this policy statement and its objectives and shall provide adequate resources, training and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

This is still a relatively new requirement on Capital and it will work proactively over the next few years to improve and develop its processes.

Capital recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

Capital maintains the following policies which are accessible to all staff via the Company Intranet.

- Equal Opportunities Policy
- Anti- harassment & Bullying Policy
- Recruitment and Selection policy.

### Our supply chain

Capital Hair & Beauty utilise a wide range of suppliers in both the UK and overseas, with all suppliers expected to meet our strict requirements around human trafficking and slavery.

In respect of due diligence we regularly review our supply chain and ensure that our core principles on modern slavery are adhered to, which include:

- We are committed to protecting and preserving the rights of our employees, those employed in our supply chain, and those affected by our operations;



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- We believe that all employment should be freely chosen and commit to refrain from any form of forced or involuntary labour;
- We are opposed to the use of any form of child labour or practices that inhibit the development of children.

### Embedding the principles

During 2018, Capital have undertaken the following activities.

- Ensured that consideration of the modern slavery risks and prevention are added to Capital's policy review process as a procurer of goods and service.
- Ensure procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Ensured ongoing engagement and communication between equality and diversity leads, our procurement team and the wider organisation.
- Written to all suppliers, to further promote our commitment to the abolition of Modern slavery and to ask them to confirm their compliance with our policies.

A copy of this policy is accessible to all employees on the Intranet. It is also published on our website.

A copy of the Modern Slavery Act 2015 can be obtained from the HR department on request.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018.

A handwritten signature in black ink, appearing to read "P Vans Agnew", with a horizontal line extending to the right.

Peter Vans Agnew  
Managing Director.

May 2019