

## **Anti-slavery and Human Trafficking Policy**

### **1. Policy**

Modern slavery is a crime and a violation of fundamental human rights. Cogent does not tolerate any form of modern slavery and human trafficking within our organisation or supply chains.

Cogent is committed to taking all practical steps to prevent and detect non-compliance and to transparency through the publication of an annual statement detailing the steps taken during the financial year.

We expect all UK and non UK organisations which have, or seek to have, a business relationship with Cogent to act at all times in a way which is consistent with our anti-slavery and human trafficking values.

The Modern Slavery Act 2015 (the 'Act') prohibits all forms of modern slavery. Modern slavery is a term used to describe the criminal offences of slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common deprivation of a person's liberty in order to exploit them for personal or commercial gain. Any person found guilty of committing an offence under the Act may be sentenced to life imprisonment. More information about the signs and features of modern slavery can be found at [www.modernslavery.co.uk](http://www.modernslavery.co.uk).

### **2. Principles**

- The Finance and Business Functions Director is responsible for this policy and all documentation.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.
- Cogent is committed to:
  - Transparency of its anti-modern slavery practices;
  - Acting ethically and with integrity in all business dealings;
  - Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within the business or within the supply chain. We expect the same high standards from all suppliers and third parties.
- All requests for information from clients and customers should be sent to the Finance and Business Functions Director, who will respond in a timely manner.
- Cogent reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.
- This policy covers the activities of the Cogent group of companies. It governs all business dealings and the conduct of all persons or organisation's with whom Cogent contracts directly, or who it appoints to act on its behalf. This includes grant holders, suppliers and contracted companies.
- This policy applies to all employees and officers of Cogent, and to any workers, consultants, contractors, agents, seconded staff, homeworkers, and agency staff, volunteers, interns, agents, and subsidiaries acting for, or on behalf of, Cogent or any other person associated with Cogent within the UK.

### **3. Procedures**

#### **a. Modern Slavery Information**

- Modern slavery takes various forms including Slavery, servitude, forced and compulsory labour and human trafficking.

- There is no typical victim of modern slavery and some victims do not understand that they have been exploited and that there is help and support available. The following are some indicators that may indicate there is modern slavery:
  - The employee is not in possession of their own passport or ID;
  - The employee is acting as though they are being instructed or led by someone else;
  - The employee allows others to speak for them;
  - The employee is dropped off and picked up from work;
  - The employee appears withdrawn or frightened;
  - The employee does not seem to have friends or to interact with friends or family freely;
  - The employee has limited social interaction or contact with people outside of their environment.
- The above list is not exhaustive and there may be other indicators that may point towards slavery. Equally, each item on the above list on their own does not necessarily constitute slavery.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.

## **b. Modern Slavery Prevention**

- All staff must ensure that they read, understand and comply with this policy.
- All staff are responsible for preventing modern slavery and human trafficking from taking place within our organisation. All business activities must be conducted in a manner such that the opportunity for, and incidences of, modern slavery taking place are prevented.
- Cogent's zero tolerance approach to modern slavery must be communicated to suppliers, contractors and all other third-parties at the outset of any business relationship, and reinforced thereafter.

## **3.2 Modern Slavery Detection and Reporting**

- Any suspicion that modern slavery or human trafficking is taking place within our organisation or supply chains, must be reported to your line manager.
- Cogent is committed to ensuring that no one suffers any detrimental treatment as a result of reporting internally in good faith their suspicion that modern slavery is, or may, be taking place within our organisation or supply chains.

## **3.3 Investigation**

- The Finance and Business Functions Director or HR Director (as appropriate) are responsible for investigating any reported suspicion that modern slavery or human trafficking may be taking place within our organisation or supply chains. Where appropriate the investigation may be delegated.

## **3.4. Case Conclusion**

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal.
- Cogent reserves the right to terminate its relationship with any individual or organisation with whom it contracts directly, or appoints to act on its behalf, where modern slavery is suspected.

## **4. Associated Documentation**

- Cogent Slavery and Human Trafficking Statement