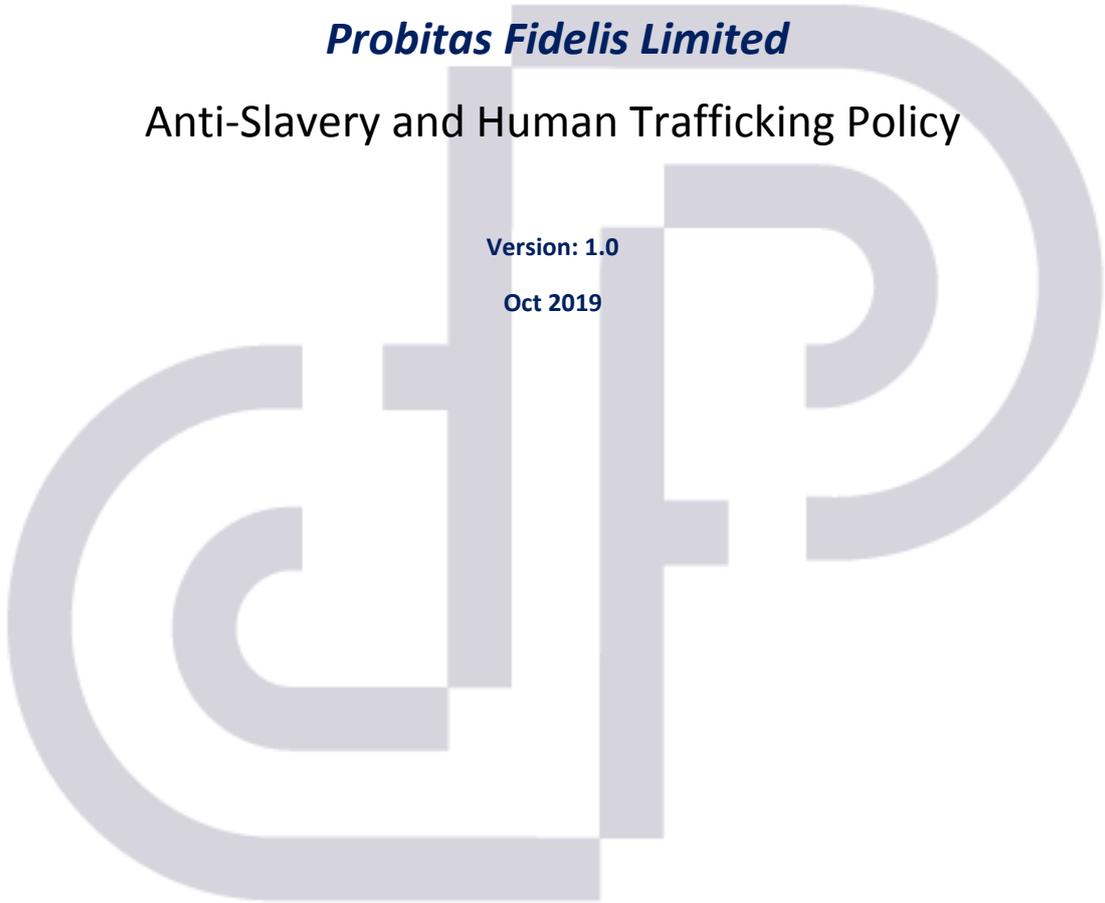


Probitas Fidelis Limited

Anti-Slavery and Human Trafficking Policy

Version: 1.0

Oct 2019



Whichford House
Oxford Business Park
John Smith Drive
Oxford OX4 2JY
United Kingdom



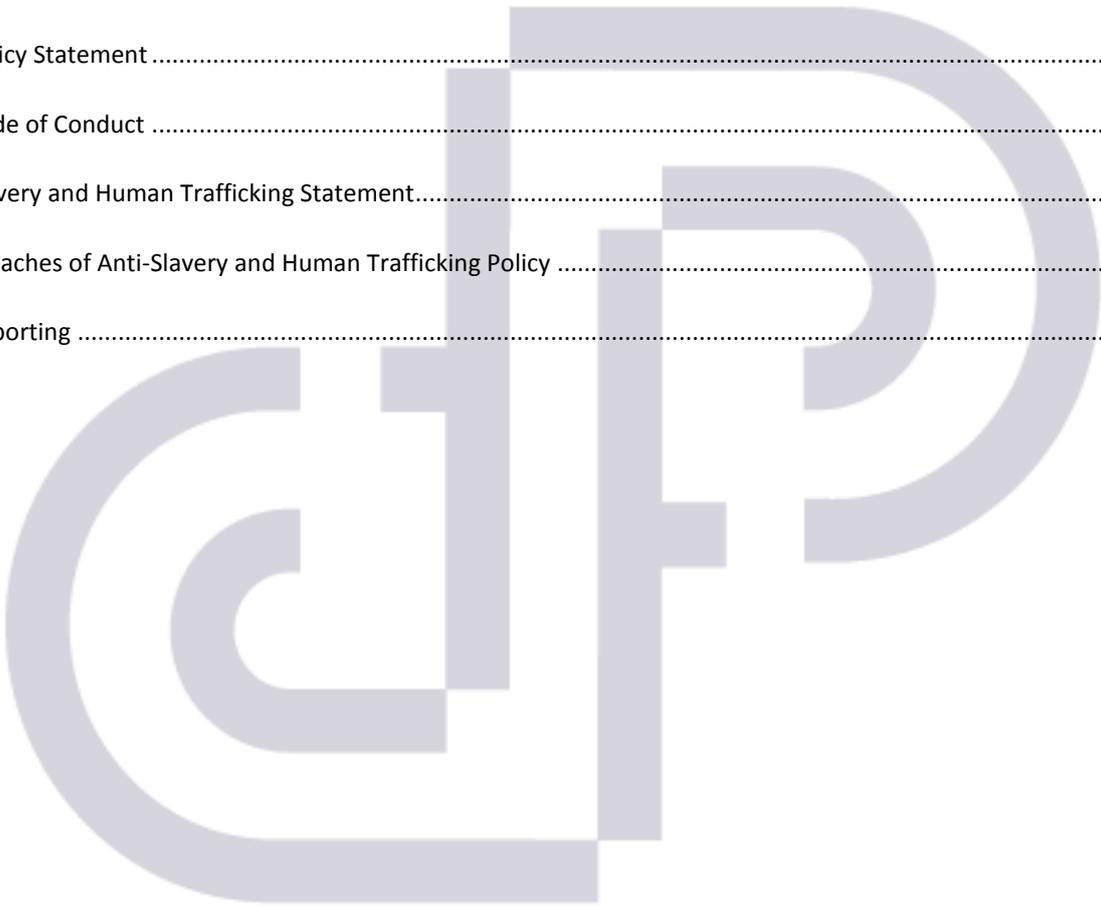
info@probitas-europe.com
probitas-europe.com
T: +44 (0) 1865 596110
F: +44 (0) 1865 596175



Company Number: 07619383
FCA FRN 596481
London Stock Exchange LEI
213800HQ7Q2HS26LMC48
HMRC AML12666773

“Et gloriam praecedat humilitas”

1	Purpose	3
2	Review of Policy	3
3	Application	3
4	Definitions	3
5	Policy Statement	3
6	Code of Conduct	3
7	Slavery and Human Trafficking Statement.....	4
8	Breaches of Anti-Slavery and Human Trafficking Policy	4
9	Reporting	5



“Et gloriam praecedat humilitas”

1 Purpose

This policy details Probitas Fidelis Limited approach to Anti-Slavery and Human Trafficking.

2 Review of Policy

This policy will be reviewed regularly, at least once a year, and amended as considered necessary by the Firm's Management Body in the event of changing circumstances or laws.

3 Application

This policy applies to everyone working for the Firm or on its behalf, in any capacity, including employees at all levels, directors, agency workers, volunteers, agents, contractors and suppliers.

4 Definitions

Modern slavery is a term used to encompass slavery, servitude, forced or compulsory labour of adults or children and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

5 Policy Statement

The Firm has a zero tolerance approach to slavery and human-trafficking and strictly prohibits the use of modern slavery and human trafficking in its business and supply chains.

All employees have the responsibility to prevent, detect and report modern slavery within the business or its supply chain. They must not participate in, facilitate or fail to report any activity that might breach this policy.

The Firm has implemented, and will continue to implement, systems and controls to ensure that modern slavery is not taking place anywhere within its business or its supply chains.

The Firm expects that all its suppliers will hold their own suppliers to the same standards.

The Firm will ensure that the relevant employees will receive training on anti-slavery and human trafficking.

6 Code of Conduct

The Firm complies with the following code of conduct:

“Et gloriam praecedat humilitas”

Forced or involuntary labour – Employees will not be subject to any form of forced labour. Employees have the right to terminate their employment at any stage subject to an agreed notice period and without any penalties, this is set out in their contract of employment.

Humane Treatment – All employees will be treated fairly and equally. The workplace will be free from any threats of violence, harassment or intimidation. The Firm operates a grievance policy and procedure and a bullying and harassment policy and procedure.

Personal freedom of movement – Employees will not be physically confined to the workplace or have their movements restricted by force or threats.

Documentation Retention – Employee’s documents, including passports, visas, work permits and travel documents, will not be withheld, so as not to bind the employee to employment or restrict their freedom of movement.

Wages and benefits – Employees will receive at least the national minimum wage and the legally required benefits. Payments will be paid in regular intervals and will not be illegally withheld. Employees will be provided with clear information on their hours work, rates of pay and any deductions. Only deductions that are taken with the employee’s consent or are legally authorised will be taken. Wage deductions will not be used as a disciplinary measure or to restrict employee’s freedom of movement.

Recruitment fees or deposits – Employees will not be charged any fees for recruitment or asked to lodge any deposits or payments in exchange for employment.

7 Slavery and Human Trafficking Statement

The Firm is required to produce an annual slavery and human trafficking statement as it has an annual turnover of more than £36 million.

The statement will be produced as soon as possible after the end of the Firm’s financial year, approved by the Management Body of the Firm and will be published on the Firm’s website.

8 Breaches of Anti-Slavery and Human Trafficking Policy

Any concerns about breaches of this policy can be confidentially raised as per the Whistleblowing Policy.

Any employees who breaches this policy could face disciplinary action, which could result in dismissal.

The Firm may terminate its relationship with other individuals or organisations working on its behalf if they breach this policy.

“Et gloriam praecedat humilitas”

9 Reporting

The first point of contact for all modern slavery crimes should be the local police force. If there is information about modern slavery crimes, those who are committing such crimes or where victims are at risk, that requires an immediate response then these should be reported by dialling 999.

If information is held that could lead to the identification, discovery and recovery of victims in the UK, the Modern Slavery Helpline 08000 121 700 can be contacted.

