Rosa Engineering Ltd

Human Trafficking and Modern Slavery Procedure



Table of Contents

1.	Introduction	3
2.	Commitment	3
3.	Compliance with Legislation	3
4.	Employee Training and Awareness	3
5.	Supply Chain Management	4
6.	Reporting and Whistleblowing	4
7.	Continuous Improvement	4
8.	Communication and Training	4
9.	Monitoring and Compliance	4
10	Public Communication	5

1. Introduction

- **1.1 Purpose:** Rosa Engineering Ltd (referred to as "the Company") is committed to preventing human trafficking and modern slavery in all aspects of our operations and supply chains.
- **1.2 Scope:** This policy applies to all employees, contractors, suppliers, and business partners associated with Rosa Engineering Ltd.

2. Commitment

- **2.1 Zero Tolerance:** The Company has a zero-tolerance approach to human trafficking and modern slavery and is committed to acting ethically and with integrity in all business dealings.
- **2.2 Responsibility**: Responsibility for implementing this policy rests with senior management, who will ensure that adequate resources and training are provided.

3. Compliance with Legislation

- **3.1 Legal Obligations:** The Company will comply with all relevant legislation and regulations related to human trafficking and modern slavery.
- **3.2 Risk Assessment:** The Company will periodically assess its operations and supply chains to identify and assess areas at risk of human trafficking and modern slavery.

4. Employee Training and Awareness

- **4.1 Training:** The Company will provide training to its employees to raise awareness of human trafficking and modern slavery issues and help them recognize potential signs.
- **4.2 Reporting**: Employees will be encouraged to report any concerns or suspicions of human trafficking or modern slavery.

5. Supply Chain Management

- **5.1 Supplier Due Diligence:** The Company will assess its suppliers and business partners to ensure that they also have effective measures in place to combat human trafficking and modern slavery.
- **5.2 Contractual Agreements:** Supplier contracts will include clauses requiring compliance with this policy.

6. Reporting and Whistleblowing

- **6.1 Reporting Mechanisms:** The Company will establish mechanisms for employees, suppliers, and other stakeholders to report human trafficking and modern slavery concerns confidentially.
- **6.2 Protection:** Whistleblowers will be protected from retaliation or adverse action for reporting in good faith.

7. Continuous Improvement

- **7.1 Evaluation**: The Company will regularly evaluate the effectiveness of this policy and its associated procedures.
- 7.2 Improvement: Identified weaknesses will lead to updates and improvements in our practices.

8. Communication and Training

- 8.1 Communication: This policy will be communicated to all employees, suppliers, and business partners.
- **8.2 Training:** The Company will offer training and resources to raise awareness and understanding of human trafficking and modern slavery issues.

9. Monitoring and Compliance

- 9.1 Review: The Company's leadership will review this policy and its implementation annually.
- **9.2 Compliance:** Failure to comply with this policy may result in disciplinary action, contract termination, or legal action.

10.Public Communication

10.1 Transparency: The Company will publish an annual statement confirming its compliance with the Modern Slavery Act.

Ben Gooding

Director

February 2023