



Anti-slavery & Human Trafficking policy

Our policy

We aim to operate our business with respect, empathy, accountability and transparency in all the actions we take. As part of our culture of good governance for good business, we operate to a set of core values and adopt behavioural values to all our business relationships. Inclusive is our zero tolerance to the exploitation of individuals in any form and our compliance to the Modern Slavery Act 2015. We, as a business, are committed to opposing modern slavery and human trafficking in all forms and preventing it in any way we can. And, we expect no less from any person who works for us, or who we have business dealings with. And let us not forget that Modern Slavery is a criminal offence. Modern slavery is a crime and a violation of fundamental human rights. It may take various forms, but all have a common theme of depriving a person's liberty and human rights for personal or commercial gain of another. Our aim is to ensure integral to all our business relationships is the compliance to the Modern Slavery Act 2015. The procedure below is how we need you to support us to achieve this aim by ensuring modern slavery and human trafficking has no place at Arena, or within any of our supply chains. This not only supports our values of how we want to run our business, we strongly feel that it is the right thing for us all to do.

Our procedure

This procedure does not form part of any Employees' Contract. It provides a framework for the Organisation to deliver this policy and may be amended without prior notice.

'Scope': All employees, workers, volunteers and those who represent our organisation or work alongside our organisation and their third-party representatives and partners.

1. So, what are examples of modern slavery?

Basically, it is any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities: Engaging in any form of trafficking of persons; using forced labour in the performance of any work; destroying, concealing, confiscating, or otherwise denying access to a person's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority; using misleading or fraudulent practices during the recruitment of candidates or an offer of work - such as failing to provide basic legal rights and information in a language that an individual can understand or, misrepresenting information of the terms of employment/hire or the nature of the work to be done; individuals charged a recruitment fee. If in doubt, please ask your Manager.



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2. Spotting the signs of modern slavery

Guidance has been given of how we can all spot potential signs of a person who may have been trafficked or is being exploited. Not an exhaustive list but examples given are individuals who appear: malnourished or unkempt; seem withdrawn, anxious and unwilling to interact; seem to be under the direct control and influence of others; live in cramped, dirty, overcrowded accommodation; have no access or control of their passport or identity documents; appear nervous, untrusting and avoid eye contact; show signs of abuse or health issues. If you are uncertain, please raise your concern with your manager.

3. How we will implement our policy

Procurement We recognise the services and goods we acquire from others is a key area of risk that we need to manage. We will conduct a risk assessment to identify exactly where our business may be at risk of modern slavery and human trafficking and take the appropriate actions. We will ensure all suppliers are aware of this Anti-Slavery Policy and ensure they have taken actions within their business and their supply chain to ensure modern slavery is not occurring in their businesses. Part of this will be to ascertain if they have suitable operating procedures in place including: Anti-Slavery and human trafficking; Procurement; Recruitment; Whistleblowing (to formally raise concerns), and a system to monitor and audit compliance. We may also require a supplier to complete pre-qual. if deemed appropriate prior to doing business with them. We will include in our terms and conditions the requirement for compliance to this policy and our right to audit their activities if needed and practicable where we have reasonable suspicion of malpractice.

Communication Our zero-tolerance approach to modern slavery and human trafficking will be communicated to all our workforce, suppliers, contractors and business partners at the outset of our business relationship, and reinforced as appropriate thereafter. As part of our individual terms and conditions with an individual or business we will make it clear that we will expect total compliance to our procedures and the Modern Slavery Act. We will also make it clear that a breach of this requirement will be considered a serious fundamental breach of our terms and conditions (see item 9 below).

4. Responsibility

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are fully aware of the issue of modern slavery and human trafficking within supply chains. You, as do the rest of our team at every level, have an



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individual obligation to familiarise yourself with this procedure and to help us in the identification and prevention of modern slavery and human trafficking across our business. And, to report any concerns as part of your contract with us. The Director of Operations has the responsibility for auditing our compliance and evaluating the effectiveness of this procedure in meeting our policy (our aims) and report their findings to the Group Managing Director.

5. Raising a concern

As with all our procedures we encourage all our workforce, including you, to be our 'eyes and ears'. Often it is you our workforce, who are the first to witness, or have a suspicion of any type of wrongdoing within our business. We will take all concerns in how we operate our business seriously. Please raise any concern you may have with your Line manager or Operations Manager if more appropriate. We aim to encourage openness and will support and protect anyone who raises genuine concern in good faith under this policy, even if they turn out to be mistaken. If you have a reasonable belief that modern slavery or human trafficking, in whatever form is, or may be, taking place in any part of our business, or in any part of our supply chain, it is your duty to raise a concern.

6. Investigating procedure

We will appoint a competent person to investigate concerns raised. They will:

Step one: Obtain and record full details, clarification and any supporting evidence from the person raising the concern;

Step two: Hold a full investigation and record findings. The investigator has the autonomy to involve any internal or external (Company auditors/police) as deemed necessary in consultation with the Company Group MD;

Step three: If the investigation supports actions that may be considered as a potential Gross Misconduct issue for employees, this allegation will be further investigated and managed within our Disciplinary procedure. If a reasonable belief of an illegal practice, we reserve the right to inform the relevant authorities;

Step four: Report findings to the Managing Group MD who will decide what action to take;

Step five: the decision on actions to be taken will be recorded and implemented.

7. How will we evaluate our effectiveness

Arena will audit to verify that our business is being conducted in compliance with this Policy.

All employees, workers, associates and third parties through whom we do business with are



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required to fully and promptly cooperate with our internal and external auditors and investigators if required to do so. All individuals are contractually required to respond fully and truthfully to their questions, requests for information and documents. Any failure, or suspicion that any party has tampered with any information or documentation, or has provided false answers or information, or deleted email or other documents will be considered as a Gross Misconduct issue for any employee, and a fundamental breach of terms and conditions for any non employee. Upon the results of any review or audit, the Director of Operations will liaise with the Group Managing Director on actions needed to ensure the compliance to this procedure. You are invited to comment on this policy and procedure and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Director of Operations.

8. Confidentiality

We will treat all concerns and disclosures and any information provided to us in a confidential and sensitive manner. The identity of the individual raising the concern will be kept confidential so long as it does not hinder or frustrate our investigations. However, a fundamental part of the investigation may involve the person raising the concern or disclosure providing a statement as part of the evidence required. It is important to note that no contractual clause or agreement will override this procedure or your right to make a protected disclosure. It is prudent to advise that our duty to report an illegality will override any confidentiality clause.

Anonymous allegations We encourage you to put your name to any concerns or disclosures, as not to do so, makes it much less credible and will be considered at the discretion of the Director or Operations in liaison with the Group Managing Director. In exercising discretion, we will take the following into account: the seriousness of the issues raised; the credibility of the concern; the likelihood of confirming the allegation from attributable sources.

9. Breach of this procedure

Any alleged breach of this procedure would be investigated for an employee within our Disciplinary procedure as a potential Gross Misconduct issue with one of the potential penalties being dismissal. For a non-employee as a potential fundamental breach of our agreed terms and conditions which may lead to termination of our Agreement with immediate effect.

10. Responsibilities and compliance

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Our Management team are responsible for ensuring this procedure is followed. Directors to support the management team as required. We ask that our employees fully engage with this process as required. Ultimately the Management team are responsible for ensuring this policy and procedure is implemented and to give feedback to the Company Group MD who will evaluate its effectiveness and ensure our compliance and continuous improvement.

11. Enabling documents

Description of Document	Ref	Description of document	Ref