

Modern Slavery Policy

1. Purpose and Scope

MIL Collections is committed to understanding the risk of modern slavery and the importance of adhering to this policy.

This policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that MIL Collections has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern Slavery encompasses slavery servitude, human trafficking and forced labour. MIL Collections has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

By ensuring all employees, clients and suppliers are informed of the modern slavery statement, the Company can ensure there is no modern slavery acting within the business or supply chains.

2. The Business

MIL Collections works with clients predominantly but not limited to the financial industry involving loans and outstanding payments for services or goods already received. The business uses local suppliers for office goods where possible. Suppliers are outlined in more depth in our Environmental Policy.

The Company currently uses 42 suppliers all within the UK. Our current client base totals 734 of whom are predominantly based in the UK, although we do have dealings in America and Ireland.

The Company's clients and suppliers are selected by either the Senior Management Team (SMT). However, all staff are responsible for complying with the policy and to act in accordance with its objectives.

3. High Risk Areas

The areas of the business that would be considered high risk are within our client base as we deal with both large scale companies and small businesses. To mitigate the risk in these areas we have a risk assessment drawn up that must be followed when exploring and taking on new clients.

All staff are briefed on the modern slavery policy; however, the Sales Team are responsible for securing new clients and therefore must follow the correct procedures to screen for Modern Slavery.

4. The Company's Policies

MIL Collections operates several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include but are not limited to:

- The anti-bribery policy – this policy outlines the businesses approach to bribery including gifts and acts of hospitality, explaining how employees can identify instances of this and where it can be reported.
- The equal opportunities policy – MIL Collections operates a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Alongside this, the capability policy sits nicely to ensure that all employees are aware of expectations and are treated fairly and equally.
- The grievance policy and disciplinary policy – these are in place to ensure that all employees can raise concerns about how colleagues or themselves are being treated, or about practices within our business or supply chain without fear of reprisals.
- The code of business conduct – this explains the way we behave as an organisation and how we expect our employees and suppliers to act.

5. Our Suppliers

MIL Collections operates a supplier audit and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that that organisation has never been convicted of offenses relating to modern slavery. Our modern slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- They pay their employees at least the national minimum wage/national living wage
- We may terminate the contract at any time should any instances of modern slavery come to light.

6. Training

We regularly conduct training updates for our sales manager/operations manager so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain or client base.

7. Raising a Concern

If you suspect that there is an instance of modern slavery occurring in relation to the business, you are encouraged to raise concerns as soon as possible. Concerns should be raised directly to the compliance manager or MD. If you are unsure as to whether a certain action or behaviour can be considered modern slavery, consult the compliance manager.

The Company will familiarise all employees with this policy and procedures so employees can vocalise their concerns swiftly and confidently.

8. Protection

If you raise a concern regarding modern slavery, MIL Collections understands that you may feel worried about potential repercussions. MIL Collections will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

9. Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

This policy is made pursuant to section 54 of the Modern Slavery Act 2015 and was last reviewed on: 15th July 2020.

Name:

Signed:

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