

LanguageLine Solutions Modern Slavery and Human Trafficking Statement 2023 to 2024

This statement outlines the steps LanguageLine Solutions Limited (LLS) has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

Our commitment to the principles of the Modern Slavery Act 2015

LLS is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Organisational structure and supply chains

Our Management Systems are modelled upon ISO standards aimed at delivering continuous improvements over time. We set Policy Objectives over the issues to be managed; we set annual measurable goals (targets), and determine the action required to meet those goals. We check our progress to ensure our policy objectives and set goals are being achieved.

We recognise that LLS' supply chain is critical to our success and is also a primary risk area. We therefore seek to build lasting relationships, treating our suppliers fairly and paying promptly. We want to work with suppliers who share our values and support us in delivering our purpose to create better outcomes.

We are committed to working with our supply chain to ensure that together we can achieve wider social, economic and environmental benefits, and safeguard employees and workers, especially those most at risk to labour exploitation, and vulnerable or disadvantaged families who face barriers to sustainable employment and income.

Due Diligence

Under the Modern Slavery Act (Transparency in Supply Chains) Regulations 2015, we understand that ensuring compliance within our supply chain is just as important as ensuring compliance within our business. This includes both suppliers and third-party suppliers. We expect the high standards we set ourselves to flow through the supply chain, and so we dedicate considerable time to our procurement process in selecting, vetting and working with suppliers to ensure they aim for these high standards too.

Even if our suppliers do not have any procedures or policies against Modern Slavery, we believe it is our duty to raise this fundamental concern with them, as this not only raises awareness, but it is also the first step to being conscious on this subject in any future dealings.

Our policies in relation to the Modern Slavery Act 2015

We apply the following company policies to minimise and mitigate the risks of modern slavery in our business and supply chain. They apply to all LLS employees and are available within the Staff Handbook:

- Employee professional conduct policy
- Whistleblowing policy
- Anti-harassment and bullying policy
- Equality and diversity policy
- Recruitment policy
- Anti-slavery and human trafficking policy
- Disciplinary policy
- Social media policy
- Code of Conduct

Commitments to embed the principles of the Modern Slavery Act 2015

We will continue to embed the principles through:

- seeking to ensure that we do not inadvertently support Modern Slavery. We make our processes known to potential staff and suppliers as a means of encouraging good practice;
- ensuring that all staff are legally entitled to work in the UK and that any contract is directly with them. We also ensure that any recruitment agency we utilise for the placement of temporary

staff follows the same requirements to confirm the identity and right to work of individuals placed with us;

- ensuring that services where we have outsourced staffing requirements, i.e. cleaning, are through companies that also have a modern slavery statement, if that is a statutory requirement, and that all such suppliers provide information about their equality policies and practices;
- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking;
- ensuring that staff and linguists are appropriately aware and trained to look out for and report signs of modern slavery when engaging with stakeholders, clients, end-users and suppliers;
- ensuring, when undertaking reviews of relevant HR policies, that they include the consideration and prevention of risks of engagement of people or groups through Modern Slavery;
- ensuring staff involved in procurement activity are aware of and follow guidance on [GOV.UK](https://www.gov.uk)
- ensuring that consideration of the modern slavery risks and prevention are added to LLS' policy review process as an employer and procurer of goods and services
- continuing to take action to embed a zero-tolerance policy towards modern slavery
- ensuring that staff involved in procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

This statement has been approved by Vanessa Eke, Managing Director, for the financial year ending 31 March 2023.

This statement will be reviewed and updated every year.