

## MODERN SLAVERY POLICY

Last Review Date	23.05.2022
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Review Committee	DFL Board
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Approved on	19/07/2021
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Next Review Date	May 2023
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### Key Information

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| 1. Document Owner      | Director of People   |
| 2. Policy Stakeholders | Chief Operating Officer<br>Marketing Director<br>Risk & Compliance Director<br>Director of Pre Arrangement<br>Marketing Director – Funeral Plans<br>Distribution Director<br>Group Financial Accountant<br>Senior Compliance Officer |
| 3. Distribution List   | As detailed in the Scope   |

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# 1. PURPOSE

The purpose of this policy is to provide a framework for reporting any concerns regarding slavery and human trafficking. Such activities are abhorrent and there is an expectation that any concerns are reported to management who will act upon them immediately.

# 2. SCOPE

This policy applies to

- Dignity plc;
- Dignity Funerals Ltd;
- All its trading locations, trading names and subsidiaries;
- Our people, namely everyone engaged within our company (including officers, employees, workers and consultants);
- All third parties engaged by and representing or acting on behalf of us in whatever capacity (including agents, intermediaries and business partners).

This means that anyone working for, or on behalf of us will implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business.

# 3. REGULATION & LEGISLATION

This policy will comply with and use all means to meet all legal and regulatory requirements in the United Kingdom that are applicable in relation to the provision of funeral services to consumers, including without limitation, all applicable statutes, statutory instruments, orders, regulations and codes of practice (whether or not having the force of law) in force from time to time, and in particular but without limitation the requirements, rules, regulations, guidance and codes of practice of The Financial Services and Markets Act 2000 (FSMA), Data Protection Legislation, the FCA and the Funerals Market Investigation Order 2021

This policy is in line with the Equality Act 2010.

# 4. DEFINITIONS

**Organisation:** For the purposes of this policy, the term 'organisation' relates to the entities defined within the scope of the document.

## 5. POLICY

### 5.1 Company Commitment

***The organisation is committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business.***

### 5.2 Risk Identification and Mitigation

- Limit the geographical scope of our business partners to ensure optimum control;
- Where possible, build standing relationships with suppliers and make clear our expectations of business behaviour by issuing each with our detailed expectations;
- Wherever possible, within national or international supply chains, our point of contact should be a UK company or branch, with suitable anti-slavery and human trafficking policies and processes which must be made available to us.
- Everybody in our supply chain should adopt a 'one-up' due diligence on the next link in the supply chain. It is not practical for us to have a direct relationship with all links in the chain;
- Encourage the reporting of concerns and the protection of Whistleblowers.
- Accountability to monitor Anti Slavery appointed to a senior manager to who is accountable on the board.

### 5.3 Measuring Effectiveness of the Policy

The organisation will use the following key performance indicators (KPIs) to measure the effectiveness of our Modern Slavery Policy and to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of house audits by business development managers and regional managers;
- Spot checks – including foreign visits and inspections;
- Use of labour monitoring and payroll systems;
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

## 6. POLICY BREACH

If this policy is breached or suspected of being breached for any reason this must be reported to maintain appropriate oversight, support risk management systems, and minimise customer harm. There are various mechanisms to report a failure in a policy/procedure:

- Whistleblowing procedure
- Incident reporting procedure
- ISO non-conformity reporting

- Reporting to a line manager or senior manager

## 7. ASSOCIATED DOCUMENTS

GP-OT-GP-009 Whistleblowing Policy

## 8. TRAINING

All staff adhering to this policy will be properly trained and informed of expectations to meet the requirements of the policy and their specific role in the business function. This will be concluded via various mediums including but not limited to:

- LMS training modules
- CGDL reading and acknowledgement requirements
- On the job training, mentoring, and monitoring

## 9. REQUEST FOR CHANGE TO POLICY

Any suggested improvements or changes to this policy can either be discussed directly with the Head of Risk and Governance or entered on a Document Change Request Form (JP-MS-MS-001). Changes must not be implemented without the relevant approval.

## 10. REVISION HISTORY

Document Identification	Comments and Changes	Date Approved
GP-OT-GP-011-00(0)	First draft – extracted from <a href="http://www.dignityplc.co.uk/responsibility">www.dignityplc.co.uk/responsibility</a> .	n/a
GP-OT-GP-011-00(1)	Key Information (front page) updated. Amend to Scope and Regulation and Legislation	n/a
GP-OT-GP-011-01(0)	Change to Marketing Director title.	19/07/2021
GP-OT-GP-011-01(1)	DFL Board sign off obtained	23.05.2022