

WILLIAM TURNER

**Modern Slavery  
and Human  
Trafficking Policy**

2025

# Purpose

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William Turner Ltd is committed to the highest standards of ethical conduct and integrity in all our business activities. This policy sets out our approach to preventing modern slavery and human trafficking within our operations and supply chains in line with the UK Modern Slavery Act 2015.

# Scope

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This policy applies to all employees, directors, contractors, agency workers, suppliers, and any third parties acting on behalf of William Turner Ltd.

# Our Commitment

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## **William Turner Ltd will:**

Maintain a zero-tolerance approach to all forms of modern slavery, servitude, forced or compulsory labour, and human trafficking.

Take active steps to identify and address risks of modern slavery in our supply chains and operations.

Ensure that all workers, whether directly employed or in our supply chains, are treated with dignity, fairness, and respect.

# Responsibilities

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- Board of Directors – Has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- Senior Management – Responsible for implementing the policy, including reviewing procedures and ensuring sufficient resources are in place.
- Procurement Team – Responsible for ensuring that supplier due diligence is undertaken and suppliers meet our ethical standards.
- All Employees – Must comply with this policy and report any concerns relating to potential breaches.

# Risk Management & Due Diligence

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- William Turner Ltd will:
  - Conduct regular risk assessments of our supply chains, identifying areas with higher exposure to modern slavery.
  - Require all suppliers to sign and comply with our Supplier Code of Conduct, which explicitly prohibits the use of forced, bonded, or involuntary labour.
  - Carry out due diligence on new suppliers, including country risk profiling and ethical sourcing assessments.
  - Monitor existing supplier compliance through audits, self-assessments, or third-party verification where appropriate.

# Training and Awareness

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- All relevant staff will receive training to understand the risks of modern slavery and how to spot potential warning signs.
- Refresher training will be delivered annually, and awareness will be embedded into onboarding processes for new employees.

# Reporting Concerns

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- Employees and third parties are encouraged to raise concerns via our Whistleblowing Policy, which allows anonymous reporting and protection from retaliation.
- All reports will be taken seriously and investigated appropriately.

# Remediation and Continuous Improvement

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- Where evidence of modern slavery is identified, William Turner Ltd will act immediately to address the issue, including working with suppliers to improve practices or, if necessary, ending the business relationship.
- We will regularly review and update our processes and supplier engagement to ensure continuous improvement in preventing modern slavery.

# Policy Review

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- This policy will be reviewed annually and updated to reflect changes in legislation, best practices, and our ongoing commitment to ethical business conduct.

**Print:** \_\_\_\_\_ **Position:** \_\_\_\_\_

**Signed:** \_\_\_\_\_ **Date:** \_\_\_\_\_

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