9-10 Bath St, Bath BA1 1SN
qas@quidos.co.uk
01225 667570 | quidos.co.uk

Title:	Anti-Slavery and Human Trafficking Policy		
Issue:	V1.1		
Issued by:	Eleanor Wyatt	**Date:**	04/08/2026
Approved by:	Catherine Garrido	**Date**	04/08/2026

Revision History

Issue	Issued	Approved	Reviewed	Notes
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1.1	04/08/2026	04/08/2026		

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Anti-Slavery and Human Trafficking Policy

Section 1: Purpose

Quidos is committed to conducting business ethically, responsibly, and with integrity. We recognise that modern slavery and human trafficking are serious criminal offences and violations of fundamental human rights.

The purpose of this policy is to outline Quidos' commitment to preventing modern slavery, forced labour, human trafficking and exploitation within our business operations and throughout our supply chain. This policy supports compliance with the Modern Slavery Act 2015 and forms part of our wider commitment to ethical business practices, corporate social responsibility, and responsible procurement.

Section 2: Scope

This policy applies to all individuals working for or on behalf of Quidos, including:

- Employees
- Directors
- Agency workers
- Temporary workers
- Contractors
- Consultants
- Volunteers
- Apprentices
- Suppliers
- Subcontractors
- Business partners
- Any third party acting on behalf of Quidos

All individuals are expected to comply with this policy and to support Quidos in preventing modern slavery and human trafficking.

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Section 3: Policy Statement

Quidos operates a zero-tolerance approach to all forms of modern slavery, forced labour, servitude, debt bondage, child labour and human trafficking.

We are committed to:

- Acting ethically and with integrity in all business relationships.
- Implementing effective systems and controls to minimise the risk of modern slavery.
- Promoting transparency throughout our business and supply chains.
- Complying with all applicable legislation relating to modern slavery and human trafficking.
- Encouraging the reporting of concerns without fear of retaliation.
- Working with suppliers and business partners who share our commitment to ethical employment practices.

We expect all organisations working with or on behalf of Quidos to adopt equivalent standards and to ensure these standards are applied throughout their own supply chains.

Section 4: Definitions

Modern slavery is an umbrella term covering a range of exploitative practices including:

- Slavery
- Servitude
- Forced or compulsory labour
- Bonded labour
- Child labour
- Human trafficking
- Domestic servitude
- Labour exploitation

Human trafficking occurs where a person arranges, recruits, transports, transfers, harbours or receives another person for the purpose of exploitation.

Modern slavery can occur in any country, industry or organisation and may involve coercion, deception, abuse of vulnerability or restriction of an individual's freedom.

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Section 5: Roles and Responsibilities

Senior Management

Senior Management are responsible for:

- Promoting an ethical culture throughout the organisation.
- Ensuring appropriate resources are available to implement this policy.
- Reviewing modern slavery risks.
- Supporting investigations.
- Reviewing policy effectiveness annually.

Managers

Managers are responsible for:

- Promoting awareness of this policy.
- Identifying potential risks within their areas of responsibility.
- Escalating concerns promptly.
- Supporting due diligence activities.
- Ensuring staff receive appropriate awareness training.

Employees and Contractors

Everyone working for or on behalf of Quidos must:

- Comply with this policy.
- Remain alert to indicators of modern slavery.
- Report any concerns immediately.
- Cooperate with investigations.
- Complete mandatory awareness training where required.

Failure to report known or suspected modern slavery may constitute a disciplinary matter.

Section 6: Risk Assessment and Due Diligence

Quidos adopts a risk-based approach to identifying and mitigating modern slavery risks.

Risk assessments may consider:

- Supplier location.
- Industry sector.

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- Labour-intensive activities.
- Recruitment practices.
- Use of temporary labour.
- Outsourced services.
- Previous compliance history.
- Information from audits or external sources.

Supplier due diligence may include:

- Supplier questionnaires.
- Review of Modern Slavery Statements where applicable.
- Contractual commitments.
- Ethical procurement checks.
- Supplier performance monitoring.
- Risk-based supplier audits where appropriate.

Higher-risk suppliers may be subject to enhanced due diligence before engagement or contract renewal.

Section 7: Supplier Expectations

Quidos expects suppliers to:

- Comply with all applicable modern slavery legislation.
- Prohibit forced labour, child labour and human trafficking.
- Pay workers lawfully.
- Ensure workers are employed voluntarily.
- Allow workers to retain their own identification documents.
- Prohibit recruitment fees charged to workers.
- Provide safe working conditions.
- Maintain appropriate employment records.
- Cooperate with reasonable due diligence activities undertaken by Quidos.

Suppliers are expected to apply equivalent standards throughout their own supply chains.

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Section 8: Recruitment and Employment

Quidos is committed to responsible recruitment practices.

We will:

- Verify identity and right to work.
- Use reputable recruitment agencies.
- Ensure all employment is voluntary.
- Ensure employees are free to leave employment following contractual notice requirements.
- Prohibit the withholding of passports or identity documents.
- Pay employees fairly and in accordance with applicable employment legislation.
- Treat all employees with dignity and respect.

Section 9: Reporting Concerns

The prevention, detection and reporting of modern slavery is everyone's responsibility.

Anyone who suspects modern slavery, human trafficking or labour exploitation must report their concerns immediately.

Concerns may be raised through:

- Line management.
- Senior Management.
- The Compliance Team.
- The Quidos Whistleblowing Policy.

All concerns will be treated confidentially and investigated appropriately.

Individuals raising genuine concerns in good faith will be protected from retaliation, harassment or victimisation.

Section 10: Investigation and Response

All allegations of modern slavery or human trafficking will be assessed promptly.

Investigations will be:

- Confidential.

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- Fair.
- Objective.
- Evidence-based.
- Properly documented.

Where appropriate, Quidos may engage law enforcement agencies, regulators or other relevant authorities.

Where suppliers are found to have breached this policy, Quidos may require corrective actions, suspend business activities or terminate contractual relationships where appropriate.

Section 11: Monitoring and Continuous Improvement

Quidos will monitor the effectiveness of this policy through:

- Supplier due diligence.
- Procurement reviews.
- Internal audits.
- Whistleblowing reports.
- Employee feedback.
- Incident investigations.
- Annual management review.

Emerging risks and changes in legislation will be considered as part of ongoing policy review.

Section 12: Root Cause Analysis

Where modern slavery or significant labour exploitation is identified within Quidos or its supply chain, Quidos will undertake a documented Root Cause Analysis.

The purpose of the review is to determine:

- How the issue occurred.
- Whether existing due diligence or controls failed.
- Whether supplier management processes require strengthening.
- Whether contractual controls are adequate.
- Whether recruitment procedures require improvement.

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- What corrective and preventative actions are required.

Lessons learned will be incorporated into procurement practices, supplier management, risk assessments and employee training to reduce the likelihood of recurrence.

Section 13: Training and Awareness

Quidos will provide appropriate awareness training to employees whose roles may expose them to modern slavery risks.

Managers and employees involved in procurement, supplier management and recruitment will receive additional guidance where appropriate.

Training will be reviewed periodically to ensure it remains current and effective.

Section 14: Record Keeping

Quidos will maintain appropriate records relating to:

- Supplier due diligence.
- Risk assessments.
- Training.
- Reported concerns.
- Investigations.
- Corrective actions.
- Root Cause Analyses.
- Policy reviews.

Records will be retained in accordance with the Company's Data Retention Policy.

Section 15: Policy Review

This policy will be reviewed at least annually, or sooner where:

- Legislation changes.
- Business operations change.
- Significant supplier risks are identified.
- Investigations identify opportunities for improvement.

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- Audit findings require amendments.

Quidos is committed to continually improving its approach to preventing modern slavery and human trafficking throughout its business operations and supply chain.