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# Modern Slavery Policy

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**Prepared by:**

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**Department:** Operations

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A handwritten signature in black ink, appearing to read "D Chapman", with a long horizontal flourish extending to the right.

**Signed:**

**Date:** 23/09/25

**Approved by:**

**Name of Employee:** Richard Hillman

**Department:** Managing Director

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**Signed:**

**Date:** 24/09/25

# **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

## **1. Introduction**

Globally an estimated 50 million people are trapped in modern slavery around the world, despite it being abolished in the 19th century. In the UK there were a record 17,000 potential victims referred to the Home Office in 2023 with UK nationals making up the largest percentage (25%) of those referred. Modern slavery is a global problem transcending age, gender, and ethnicity; it includes slavery, servitude, forced or compulsory labour and human trafficking. Traffickers and those responsible for slavery use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse.

Resonate Systems is passionate about being a responsible and ethical organisation which treats everyone with dignity and respect. People have made Resonate Systems the company it is today. The organisation does not tolerate slavery and human trafficking and outlined below is its commitment to ensuring they have no place in its business. Resonate Systems directly employs 18 staff supplying underfloor heating and soundproofing products for residential, commercial applications and care homes etc.

The Modern Slavery Act (2015) requires large businesses, with sales of over a specified amount (currently £36m) to be transparent about their efforts to eradicate Slavery and Human Trafficking. Although Resonate Systems falls under this turnover threshold, as an ethical organisation it complies, in so far as it can, with all the legislation. This statement explains the steps the organisation has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or any part of the organisation.

Resonate Systems welcomes the introduction of the Modern Slavery Act and is committed to ensuring that modern slavery does not occur in any area of the company. As an organisation with an inclusive mission, it takes seriously the call to work for a just and equal society, upholding the human rights and values of freedom, respect, fairness, and independence for all. The organisation is committed to ensuring the utmost protection and safety of all people in its services and staff team.

## **2. The Organisation and its Values**

Resonate Systems was founded in 2019 to manufacture underfloor heating and acoustic insulation products. We have a diverse team of qualified technicians, sales personnel and administrators who work together to provide excellence in the production and sale of our products.

## **3. Resonate Systems Core Values**

This policy does not form a part of your contract of employment and may be updated and amended at any point as our knowledge of modern slavery and legislation dictates.

Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.

- 3.1 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.

- 3.2 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- 3.3 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 3.4 Our Anti-Slavery Officer ('ASO') is **Tammie Stretton**. They are responsible for this policy.

#### **4. The Organisation, Employees and Staff Team**

- 4.1 Resonate Systems has contracts of employment in place for all its employees and employs professional psychologists on a contract basis. Additionally, its contracts are supported by our human resources policies and procedures, which are provided individually to all staff and copies are available within the workplace. Based on our risk assessments, we deem the risk of slavery or human trafficking occurring within Resonate Systems direct employee population and contract staff population under our direct supervision, to be low.
2. Our HR policies and procedures are reviewed regularly by the organisation's Managing Director, together with our HR Consultants, to ensure we remain compliant and amend as necessary.
- 4.3 Resonate Systems conduct "right to work" checks on all direct employees prior to them commencing their roles with the company. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work. We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals.
3. Workers are free to choose whether to join a trade union or not and we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act (2010) and all employment legislation. We do not engage in forced or involuntary labour and have a zero-tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct.

#### **5. The Organisation, Subsidiaries and Supply Chains**

The Managing Director is responsible for the governance of this policy and ensuring that its activities are within its company objectives.

- 5.1 Suppliers who provide goods to our company are required to assess their business and supply chain and confirm to our ACO that they:
  - a. Comply with their legal obligations in relation to Modern Slavery
  - b. Are committed to ensuring that there is no Modern Slavery taking place in their business, or in any of their supply chains.
- 5.2 A copy of the suppliers Modern Slavery Policy must be provided

5.3 Where a supplier is found to have breached this policy or are found to have Modern Slavery in their business or knowingly in their supply chain, we reserve the right to terminate our contract with such suppliers and pursue legal remedies against them.

## **6. Risks and Due Diligence**

Resonate Systems are developing robust Quality Management Systems, and operate several internal policies to ensure that our activities are transparent and that we are actively reducing the risk of modern slavery:

- a. Recruitment Policy and Procedure – Resonate Systems undertakes right to work checks on all employees. Additionally, some roles require an Enhanced Disclosure and Barring Service check.
  - I. Payroll - all new starter paperwork and any subsequent pay changes go through our Administration and Finance Team and then reviewed by the organisation external Payroll Team. This ensures that all employees are paid correctly, receive at least the National Living Wage and have the relevant permissions to work.
  - II. Agency Workers – Where Resonate Systems uses agency workers, any recruitment agencies used are checked for their commitment to driving high standards, irrespective of sector and have rigorous policies in place that help drive out any aspects of human trafficking and slavery from their and their clients' supply chains.
  - III. Whistleblowing Procedure – Resonate Systems operates a Whistleblowing Policy and contained within that is the Whistleblowing Procedure which ensures that concerns can be raised, without fear of reprisals.
  - IV. Risk Assessment and Risk Management Policy - promotes a robust escalation and incident management process. The organisation's Risk Register also contains relevant information relating to Safeguarding and Personnel.
- b. Employees must immediately report any suspicions of Modern Slavery in our business or supply chain to our ASP. Our ASO will investigate and report to our Managing Director within a reasonable time, on actions which may be required to be taken.

## **7. Further Steps to Prevent Modern Slavery**

Resonate Systems continues to take the issues of modern slavery seriously and will develop its approach, reviewing and revising policies and training where necessary to ensure that it raises awareness of modern slavery throughout the organisation. Resonate Systems has robust Policies which set out the organisation's detailed stance and procedures in relation to Modern Slavery.

## **8. Summary**

Resonate Systems has zero tolerance to slavery and human trafficking and expects all its staff, business, and partner organisations to share this approach. A copy of this statement is available on the Resonate Systems website for organisations, partner organisations and the public to inspect. This statement is made pursuant to

Section (54 (1) of the Modern Slavery Act (2015) and constitutes Resonate Systems slavery and human trafficking statement for the current financial year.