

# Policy: Modern Slavery and Human Trafficking Policy

December 2023  
Human Resources

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## Introduction

The Board of Directors of OutForce has adopted this policy to provide guidelines to all directors, officers, employees, and consultants of OutForce with respect to the prevention of modern slavery and human trafficking in all aspects of our business operations.

This policy has been designed to ensure that OutForce conducts its business with the highest level of integrity and in accordance with the highest ethical standards. Each OutForce employee is responsible for the consequences of his or her actions. You are responsible for understanding and complying with this policy.

Modern slavery and human trafficking are severe violations of fundamental human rights. These practices include slavery, servitude, forced or compulsory labor, and human trafficking, as defined below. Companies can also be held liable if they fail to take reasonable steps to prevent such practices within their operations and supply chains.

It is important that you understand the scope of activities that constitute modern slavery and human trafficking and the consequences, which can be severe.

## What is Modern Slavery and Human Trafficking?

- Slavery: Exercising powers of ownership over a person.
- Servitude: The obligation to provide services is imposed by the use of coercion or force.
- Forced or compulsory labor: Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- Human trafficking: Arranging or facilitating the travel of another person with a view to their exploitation.

## Legislation Coverage

1.1 Modern slavery and human trafficking legislation primarily covers four activities:

- Slavery
- Servitude
- Forced or compulsory labor
- Human trafficking

1.2 This policy covers all four activities.

### **How is it Relevant to Us?**

2.1 Modern slavery is a complex and multi-faceted crime that requires all of us at OutForce to be vigilant and proactive in preventing it. While it may seem irrelevant to our operations at first glance, it is crucial and highly relevant.

2.2 Preventing the exploitation of people and human trafficking, and protecting our workforce and reputation, makes good business sense.

2.3 Both local and international modern slavery legislation recognize the important role businesses can and should play in tackling slavery and encourage them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

- Our supply chain
- Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- Cleaning and catering sectors and suppliers
- Corporate hospitality

### **Responsibilities**

3.1 OutForce, managers, and colleagues all have responsibilities to ensure that our fellow workers are safeguarded, treated fairly, and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye to modern slavery and human trafficking is not acceptable and not an option.

### **The Company**

3.3 OutForce will:

- Maintain clear policies and procedures to prevent exploitation and human trafficking, both within our organization and our supply chains, protecting our workforce and reputation.
- Be clear about our recruitment policy.

- Conduct checks within our supply chains and vet new suppliers.
- Lead by example by making appropriate checks on all employees and recruitment agencies to ensure we know who is working for us and with us.
- Ensure we have an open and transparent grievance process for all staff and operate a straightforward reporting procedure to deal with any concerns raised.
- Raise awareness so that our colleagues know what we are doing to promote their welfare and the welfare of individuals working in our industry.
- Make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking are not taking place in our supply chains and to demonstrate that we take our responsibility to our employees and our customers seriously.

## **Managers**

### 3.4 Managers will:

- Listen and be approachable to colleagues.
- Respond appropriately if they are told something that might indicate a colleague or any other person is in an exploitative situation.
- Remain alert to indications of slavery (see Identifying Slavery below).
- Raise awareness among colleagues by discussing issues and providing training so that everyone can spot the signs of trafficking and exploitation and know what to do.
- Use their experience and professional judgment to gauge situations and respond appropriately.

## **Colleagues**

### 3.5 All colleagues have responsibilities under this policy. Regardless of your role or level of seniority, you must:

- Keep your eyes and ears open if you suspect someone (a colleague or someone in our supply chain) is being controlled, coerced, or forced by someone else to work or provide services. Follow our reporting procedure (see Reporting Slavery).
- Follow our reporting procedure if a colleague tells you something you think might indicate they or someone else is being exploited or ill-treated.
- Inform us if you think there is more we can do to prevent people from being exploited.

## **The Risks**

### 4.1 The principal areas of risk we face related to modern slavery and human trafficking include:

- Supply chains
- Recruitment through agencies
- General recruitment

- Customers engaged in hospitality, cleaning, and catering industries

4.2 We will manage these risk areas through the procedures set out in this policy.

## **Our Procedures**

### **Anti-Slavery Statement**

5.1 We will make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking are not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain, and our customers seriously.

5.2 We will publish this statement on our website. Our historic statements will remain available on our website.

5.3 OutForce's statement will set out the following matters:

- OutForce's position in relation to the industry market
- The sectors within which it is active
- The locations in which it has a presence
- Details about our supply chains
- The key risk areas we face and our approach to avoiding and preventing modern slavery and human trafficking
- The actions we have taken to ensure that the potential for slavery and human trafficking is significantly reduced both with our suppliers, employees, and contractors

5.4 We will continue to inform the companies we do business with that we are not prepared to accept any form of human exploitation.

5.5 We will ensure that all our supplier contracts contain anti-slavery and human trafficking clauses. These clauses, which flow down through all layers of our supply chain, will prohibit suppliers and their employees from engaging in slavery or human trafficking.

5.6 We will ensure that we can account for each step of our supply process, and that we know who is providing goods and services to us. We will have mechanisms and processes in place to check, including:

- Mapping our suppliers
- Risk assessments for suppliers and questionnaires for new and existing suppliers
- Supplier audits

## Recruitment

### Using Agencies

5.7 Our Corporate HR departments will follow company policy and only use agreed specified reputable recruitment agencies. We will thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- Conducting background checks and investigating reputation
- Ensuring the staff provided have the appropriate framework (e.g., work visas)
- Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

5.8 We will conduct regular reviews of agents used.

### General Recruitment

5.9 We will ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

5.10 We will ensure staff are legally able to work in the Philippines.

5.11 We will keep a record of the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

5.12 We will provide information to all new recruits on their statutory rights including sick pay, holiday pay, and any other benefits they may be entitled to.

5.13 If, through our recruitment process, we suspect someone is being exploited, the recruitment team will follow our reporting procedures (see Reporting Slavery).

## Identifying Slavery

6.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification, or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or appears frightened.
- The person does not seem to be able to contact friends or family freely.

- The person has limited social interaction or contact with people outside their immediate environment.

6.2 This list is not exhaustive. A person may display a number of the trafficking indicators set out above but may not necessarily be a victim of slavery or trafficking. Often, you will build up a picture of the person's or circumstances which may indicate something is not quite right.

6.3 If you have a suspicion, report it directly to your manager, by raising an HR Ticket, or through direct email to: [hr\[at\]outforce.com.ph](mailto:hr@outforce.com.ph)

## **Reporting Slavery**

7.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

7.2 If you think someone is in immediate danger, dial 8888 or contact local authorities.

7.3 Otherwise, you should discuss your concerns with your immediate manager who will decide on a course of action and provide any further advice or make a report.

7.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, you discuss your concerns first with the supply chain leader before taking any further action.

## **Training**

8.1 We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

8.2 More general awareness training is provided to all staff via team leaders or managers, and through online training modules.

## **Monitoring Our Procedures**

9.1 We will review our Anti-Slavery Policy regularly, at least annually. We will provide information and/or training on any changes we make.

## **Inquiries**

Any questions about this policy, its application to a proposed transaction, or the requirements of applicable laws should be directed to the CEO.

<b>Version</b>	<b>Author</b>	<b>Process/Revision Made</b>	<b>Effectivity</b>
<b>1.0</b>	Mikel Balansag	Creation	NA
<b>1.1</b>	Joe Johnston	Simplified; Approval for Dissemination	01 Dec 2023