

# Modern Slavery & Human Trafficking Policy

The Mountain Training Trust (MTT) & Mountain Training Limited (MTL)

## Document Control

<b>Owner</b>	<b>HR Manager</b>
<b>Approver</b>	MTT Board
<b>Version</b>	1.0 (2026)
<b>Operational date</b>	22/05/2026
<b>Review cycle</b>	Annual or on material change
<b>Applies to</b>	MTT, MTL and Plas y Brenin (managed by MTT)

## Change History

<b>Version</b>	<b>Date</b>	<b>Summary of changes</b>	<b>Author</b>	<b>Approver</b>
<b>1.0</b>	<b>March 2026</b>	First formal Modern Slavery & Human Trafficking Policy. This Policy sits alongside our Modern Slavery & Human Trafficking Statement (first issued in 2024 and updated as required). HR Committee reviewed and recommended to the Board for approval.	Head of Governance	MTT Board (approved 22 May 2026)

### 1. Purpose of This Policy

This policy sets out our commitment to preventing modern slavery, forced labour, human trafficking, child labour, and all forms of exploitation across our operations and supply chain. It provides the internal framework to uphold the Modern Slavery Act 2015 and support ethical business practices.

### 2. Scope

This policy applies to:

- All employees
- Temporary and agency staff
- Contractors and subcontractors
- Consultants
- Volunteers (if applicable)
- All suppliers and organisations acting on our behalf

### 3. Policy Statement

We maintain a commitment to acting ethically and with integrity and to minimising the risk of modern slavery within our organisation and supply chain.

We are committed to ensuring that all employees, workers, volunteers, and contractors engaged by us are treated fairly, with dignity and respect, and in compliance with UK employment legislation. We expect suppliers and partners delivering work on our behalf to uphold lawful and ethical labour practices and to comply with applicable standards within their jurisdictions. We provide basic awareness information to relevant staff to support recognition and reporting of potential modern slavery concerns.

#### **4. Identifying Modern Slavery Risks**

We remain alert to potential risks, particularly in higher-risk sectors and subcontracting arrangements, and take a proportionate approach to managing them.

#### **5. Due Diligence & Supplier Management**

We expect suppliers and organisations acting on our behalf to comply with applicable employment law and to uphold lawful and ethical labour practices.

Given the nature and scale of our operations, our approach to supplier due diligence is proportionate and risk-based. As part of routine procurement activity, we seek to satisfy ourselves that suppliers are reputable, operate legally, and confirm compliance with relevant legislative requirements where appropriate. We do not routinely conduct audits of suppliers but remain alert to potential indicators of risk.

Where concerns relating to modern slavery or labour exploitation are identified or reported, we will take appropriate steps to investigate and, where necessary, take action, including escalation or termination of supplier relationships.

#### **6. Reporting Concerns**

Staff can report concerns to HR, their line manager, or via the whistleblowing route. Retaliation against anyone raising concerns in good faith is not permitted.

#### **7. Investigation Procedure**

Concerns will be assessed and addressed proportionately, with escalation where needed.

#### **8. Compliance & Enforcement**

Breaches may result in internal action or termination of supplier relationships where appropriate.

#### **9. Related Policies**

This policy should be read in conjunction with:

- Code of Conduct
- Whistleblowing Policy
- Anti-Bribery & Corruption Policy
- Recruitment Policy
- Safeguarding Policies

These policies are available in the Employee Handbook and Safeguarding Policy suite.

## **10. Review & Approval**

This policy will be reviewed annually or sooner if legal or organisational changes arise.