



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

1. STATEMENT

1.1 This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by TNT (TNT) to understand all potential modern slavery risks related to its business, and the actions undertaken to mitigate any such risks during the financial year ended 31 December 2022.

2. OUR ORGANISATION

2.1 TNT is a charity which provides Healthcare, Education and Biblical Teaching and Christian Volunteer Service. All our charitable operations are based in Nazareth, Israel, and comprise of the following: Nazareth Hospital, Academic School of Nursing, Serve Nazareth, and the Nazareth Village. We employ around 650 staff in Israel: the majority of which are healthcare professionals and are employed at the hospital.

2.2 TNT Head Office is based in Edinburgh, Scotland, where up to 5 people are employed.

2.3 TNT's operations in Israel have a number of goods suppliers and service providers, all of whom operate within Israel. Our suppliers are predominantly healthcare related e.g. hospital equipment, pharmaceutical products, and a small number of service providers include cleaning and security.

3. OUR POLICY ON PREVENTING SLAVERY AND HUMAN TRAFFICKING

3.1 The Board aims for the highest ethical and professional standards and always seeks to comply with all local laws and regulations applicable to our operations. It follows that TNT is absolutely committed to preventing slavery and human trafficking in all its activities. This commitment is emphasised in our employee training programmes and company policies. We also expect the same high standards which we set for ourselves from those parties with whom we engage, such as our suppliers and all those who access our services.

3.2 Due to the nature of our charitable work predominantly in the Health or Education sectors, we assess that there is a low risk of slavery and human trafficking within TNT. However, we aim to periodically review the effectiveness of the relevant policies and procedures that we have in place. As any instance would be expected to be a breach of law, we do not have key performance indicators in relation to slavery or human trafficking.

3.3 We are also committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our work.

3.4 Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking do not take place in any of our supply chains.

3.5 Staff in Israel are employed according to strict Israel Employment Legislation, and they are not in any category which is generally seen to be vulnerable to modern slavery in Israel. Therefore, our primary focus is to ensure there are policies and procedures in place for our contractors and suppliers.

3.6 Where contractors or suppliers are needed, TNT only contracts with reputable and established companies, in all cases undergoing a rigorous tendering process including a full due diligence assessment covering regulatory & legal compliance, HR standards, and integrity.

4. STAFF TRAINING



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HEALING IN THE NAME OF JESUS SINCE 1861

- 4.1 TNT has comprehensive recruitment processes and procedures in place. All staff undergo ID checks confirming eligibility to work in Israel to safeguard against human trafficking or forced labour. All staff have Terms and Conditions which are regularly reviewed in line with Israel employment law and best practice.
- 4.2 TNT seeks to ensure that all employees understand and comply with high ethical standards and integrity. All staff undergo induction training prior to confirmation in employment to support their understanding of ethical issues, nurture compliance with all laws and ensure compliance with core topics such as TNT's Code of Conduct, Safeguarding, Grievance and Whistleblowing Policies.
- 4.3 TNT has a comprehensive **Whistleblowing Policy** which encourages all our employees to speak out if they have concerns about any activity, breach of law, breach of our Code of Conduct, dangers to the public and any concealment of information. Our policy is designed to make it easy for all colleagues to speak up and report anonymously without any risk to their employment or suffering any form of retribution.
- 4.4 We recognise that the welfare of all of those who access our services are paramount in all circumstances regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, and socio-economic background. We also recognise that people of these protected characteristics are particularly vulnerable to abuse and we accept responsibility to take reasonable steps to ensure their welfare through adherence to our **Safeguarding Policy**.
- 4.5 In addition to these, a specific **Modern Slavery & Human Trafficking Policy** has been written to further support staff and all those associated with TNT in identifying and managing risk in this matter. As with other key policies, explanation and compliance with this policy forms a crucial part in the induction and training of all staff.

5. DUE DILIGENCE

- 5.1 As part of the Board's objectives to identify and mitigate risk, TNT engages an independent internal auditor to audit various aspects of our operations. Every year, the independent auditor assesses a specific part of our business, and subsequently provides the Board and management with a report and recommendations. The aim of the audit is to examine TNT's risk management, governance and internal control processes.
- 5.2 Regarding our supply chains, the internal auditor is tasked with identification and assessment of potential risk areas, and with ensuring that sub-contracted employees are being employed according to Israel's stringent employment legislation e.g. eligibility to work, minimum wage requirements, vaccinations etc.
- 5.3 All employees of suppliers who enter the TNT site in Nazareth are checked for their ID, medical suitability, and HR employability compliance. Accordingly, we assess that there is a low risk of slavery and human trafficking within the supply chains of TNT.

6. MONITORING

- 6.1 This statement will be reviewed **once annually**, or in the following circumstances:
 - a. changes in legislation and/or government guidance;
 - b. as required by the Scottish Charity Regulator;
 - c. as a result of any other significant change or event.



THE NAZARETH TRUST

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1. POLICY STATEMENT

1.1 The Nazareth Trust (TNT) rigidly opposes the use of modern slavery and human trafficking in all its operations and supply chains and is committed to implementing systems to ensure no instance occurs either in the organisation, or in its supply chains.

1.2 This policy applies to all who work for us or on our behalf in any capacity and at all levels.

2. DEFINITION

2.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

3. OUR COMMITMENTS

3.1 TNT expects all those working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- a. A zero-tolerance approach to modern slavery within TNT and its supply chains;
- b. Prevention, detection and reporting of modern slavery in any part of TNT and its supply chains as a responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy;
- c. Commitment to stakeholder and supplier engagement to address the risks of modern slavery not simply within TNT but throughout its supply chain;
- d. Employ a risk-based approach to contracting processes and keep them under review;
- e. Assess whether the inclusion of specific prohibitions against the use of modern slavery and trafficked labour is warranted in our third-party contracts;
- f. Assess the merits of requiring suppliers to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking, including:
 - i. All third parties supplying workers to TNT confirming their compliance within our Code of Conduct;
 - ii. All suppliers engaging workers through third parties obtaining that third parties' agreement to adhere by our Code of Conduct.
- g. Comply with ongoing risk assessment and due diligence processes in considering whether circumstances warrant TNT conducting audits of suppliers to confirm their compliance with our Code of Conduct;
- h. Take appropriate action in the event of a breach in this policy, which is also a breach of law.

4. This policy will be reviewed **once annually**, or in the following circumstances:

- a. changes in legislation and/or government guidance;
- b. as required by the Scottish Charity Regulator;
- c. as a result of any other significant change or event.