

POLICY STATEMENT

Modern Slavery & Human Trafficking

Policy Statement | Effective: May 2026 | Review: May 2027 | Version 1.0

1. Introduction & Commitment

Pendleton Events Ltd is committed to acting ethically and with integrity in all our business dealings and relationships. We implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers, and suppliers.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Pendleton Events Ltd's modern slavery and human trafficking statement. Pendleton Events Ltd is registered in England and Wales (Company No. 5132852).

2. Scope of This Policy

This policy covers the following forms of modern slavery and exploitation, each of which is addressed in detail below:

- Slave labour and forced labour
- Human trafficking
- Employment of minors
- Debt bondage and bonded labour

3. Slave Labour & Forced Labour

Definition

Slave labour refers to situations where individuals are forced to work under threat, coercion, or deception, without the freedom to leave or refuse. Forced labour encompasses any work exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.

Our Commitments

- All workers engaged by Pendleton Events Ltd, whether directly or through our supply chain, are free to work voluntarily and to leave employment without penalty.
- We do not use, support, or tolerate any form of slave or forced labour in our operations.
- All employment relationships are entered into freely, based on mutual consent and transparent terms.
- We conduct due diligence on key suppliers and sub-contractors to assess their labour practices.
- Any supplier found to be using slave or forced labour will have their contract terminated immediately.

4. Human Trafficking

Definition

Human trafficking involves the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, use of force, coercion, abduction, fraud, or deception for the purpose of exploitation. Exploitation includes forced labour, sexual exploitation, and the removal of organs.

Our Commitments

- Pendleton Events Ltd has a zero-tolerance approach to human trafficking in any form.
- We verify the right to work of all individuals engaged directly by our business in accordance with UK employment law.
- We work only with reputable staffing agencies, temporary labour providers, and suppliers who share our ethical standards.
- We require key suppliers and contractors to confirm they adhere to applicable anti-trafficking laws.
- Staff are trained to recognise the signs of trafficking and know how to report concerns confidentially.
- Any suspected instances of trafficking will be reported immediately to the relevant authorities, including the National Referral Mechanism (NRM) and the Modern Slavery Helpline.

5. Employment of Minors

Definition & Legal Framework

The employment of minors refers to work carried out by children under the legal working age in a manner that deprives them of their childhood, interferes with their education, or is harmful to their physical, mental, or social development. In the UK, the minimum school leaving age is 16, with restrictions on types of work and working hours for those aged 16–17.

Our Commitments

- Pendleton Events Ltd does not employ anyone under the age of 18 in any capacity.
- We require all staffing agencies and sub-contractors supplying personnel to our events to confirm compliance with child labour laws.
- Where events take place internationally, we apply the higher standard of UK law or local law, whichever affords the greater protection.
- Age verification is carried out as part of our onboarding process for all new workers.
- We will not engage any supplier or contractor who employs children in conditions that violate international standards, including ILO Convention 138 (minimum age) and Convention 182 (worst forms of child labour).

6. Debt Bondage & Bonded Labour

Definition

Debt bondage, also known as bonded labour, occurs when a person is compelled to work to repay a debt or loan, and where the value of their work is not reasonably applied towards the liquidation of that debt, or the length and nature of the work is not clearly defined. This is one of the most common forms of modern slavery globally.

Our Commitments

- Pendleton Events Ltd does not charge workers any fees for recruitment, equipment, or accommodation as a condition of their employment.
- We do not make deductions from wages as repayment for recruitment or placement fees.
- We require all employment agencies and labour providers in our supply chain to declare that no recruitment fees are charged to workers.
- Workers are provided with clear, written contracts in a language they understand, with transparent information about wages, deductions, and conditions before commencing work.
- We prohibit the retention of identity documents or passports as a means of control over workers.

7. Due Diligence & Supply Chain

As an event management agency, Pendleton Events Ltd engages with a range of venues, suppliers, and sub-contractors across the UK and internationally. We recognise that our supply chain carries inherent risk and we take the following steps to manage that risk:

- Supplier screening: We assess new suppliers against our ethical standards before engagement.
- Contractual obligations: Our standard supplier contracts require compliance with all applicable anti-slavery and human trafficking laws.
- Ongoing monitoring: We review supplier conduct as part of our account management process.
- Risk assessment: We identify and prioritise higher-risk areas of our supply chain, including hospitality staffing, international venues, and temporary labour.
- Continuous improvement: We regularly review and update our due diligence procedures.

8. Reporting Concerns

Anyone who suspects that slavery, trafficking, or any related exploitation is occurring within our business or supply chain should raise their concern immediately. Concerns can be raised:

- Directly with Sabine Edwards, Managing Director: sabine.edwards@pendletonevents.co.uk
- Via the Modern Slavery Helpline: 0800 0121 700 (free, 24/7)
- By contacting the National Crime Agency (NCA)
- By calling 999 in an emergency or 101 for non-urgent police matters

All concerns will be treated with the utmost seriousness and confidentiality. No individual will suffer any detriment for raising a genuine concern in good faith.

9. Training & Awareness

Pendleton Events Ltd ensures that all staff involved in procurement, supplier management, and event delivery are aware of the risks of modern slavery in our industry. Training covers recognition of warning signs, how to report concerns, and our obligations under the Modern Slavery Act 2015.

10. Approval & Review

This policy is approved by the Managing Director of Pendleton Events Ltd and will be reviewed annually, or sooner in the event of any significant change in legislation or business practice.

Signed: 

Name: Sabine Edwards

Position: Managing Director, Pendleton Events Ltd

Date: May 2026

Next Review Date: May 2027