



Anti-Slavery & Human Trafficking Policy

Version: B
10th October 2018

1. Policy Statement

- 1.1 This policy sets out our position of zero tolerance of modern slavery and human trafficking in any form in our business and supply chain. We are committed to acting ethically and with integrity in our business dealings and relationships and to maintaining systems and controls designed to ensure modern slavery and human trafficking are not taking place in our business or across our supply chain.
- 1.2 We are committed to transparency in our business dealing with clients, subcontractor and supplier partners in relation to our obligations under the Modern Slavery Act 2015. We expect, and check that all companies maintain the same high standard.
- 1.3 This policy applies to all persons who are in any form of contracted employment, whether it permanent, temporary or through a third party.
- 1.4 The policy itself is not part of any employee's contract of employment and amendments may be made from time to time.
- 1.5 It is expected that all employees adhere to this policy and that any non-compliance with the Modern Slavery Act 2015 will lead to formal company disciplinary investigation and referral to the Police.

2. Responsibility for the Policy

- 2.1 The directors of the company have overall responsibility for maintaining & amending the policy to comply with the current legal and ethical obligations of the time. They must ensure that all employees, under their control comply with it.
- 2.2 The senior management team consisting of the project managers, operations director and procurement manager have the responsibility for the daily management of this policy. This includes implementation, monitoring, investigating queries and assessing its effectiveness.
- 2.3 Management is responsible for ensuring those reporting them understand and comply with the policy.
- 2.4 As part of the companies approach to continuous improvement, in all areas of the business, employees are encouraged to suggest improvements and these should be addressed to the directors.

3. Compliance with the Policy

- 3.1 All employees must read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of all issues relating to the Modern Slavery Act 2015 is the responsibility of every employee.

3.3 If an employee is under the belief or suspicion that there is a breach regarding the company's obligation to the Modern Slavery Act, then they should notify a project manager or director of their concerns. All conversations or communications regarding the notifying employee will be held in strict confidence and information will only be provided of such a conversation or communications if criminal proceedings are initiated.

3.4 If an employee is unsure about the transparency of supply chain, contract workers or employee working conditions in relation to the Modern Slavery Act 2015 then they should raise this with a project manager or director.

3.5 As a company, we encourage openness and will support any employee who raises a genuine concern in good faith even if the outcome of any further investigation proves to be false. The company will ensure that all employees do not suffer any detrimental disciplinary action against them, if concerns have been raised in good faith.

4. Communications and Awareness of this Policy

4.1 Communication shall be as part of the company hand book and at the time of induction for any new employee. All existing employees shall receive electronic access to the policy and will be advised to review it.

4.2 All employees, subcontractors and supply chain companies will receive this policy communication, so that they are aware of our zero-tolerance policy to modern slavery and Human Trafficking.

5. Breaches of this Policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. At such a time, the company, will inform the police of the omissions of the employee, which may result in criminal proceedings against the employee.

5.2 The company will terminate any relation with any members of its supply chain or subcontractors work on our behalf, if they are in breach this policy.

Signed,



James Hepworth
Operations Director
10/10/2018