

Statement of Intent

In accordance with the Modern Slavery Act 2015, The Company and its Directors are committed to ensuring that the work environment is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”).

The Company is aware of the legislative and regulatory requirements and strongly believes that it has a commercial responsibility for promoting ethical and lawful employment practices.

Accordingly, The Company will not knowingly use unlawful child labour or forced labour in any of the services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilise child labour or forced labour.

Core Policy

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world.

This policy shall define The Company’s commitment to ensuring that human trafficking and slavery does not exist within its own business but also provides how The Company will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

Definitions

Human Trafficking: the recruitment, transportation, transfer, harbouring, or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

Freedom of workers to Terminate Employment

All personnel have the legal right to terminate their employment in accordance with the relevant notice period stated within their individual contract of employment.

Harassment

No member of staff, third party or sub-contractor, regardless of their employment status, shall be subject to harassment, bullying or intimidation.

Compulsory Overtime

Compulsory overtime is prohibited.

Right to work and identification documents

Prior to commencement of employment, The Company requires evidence of an individual's right to work in the UK. Copies of identification documents may be made but original documents shall only be used for the purpose of verification. The employee shall retain all original documents.

Requirements for Suppliers

The Company shall ensure:

- No forced or compulsory labour, for example any work or service that a worker performs involuntarily, under threat of penalty, is engaged on any of their worksites.
- That the overall terms of employment are robust and voluntary.
- They comply with the minimum age requirements prescribed by applicable laws.
- They accurately compensate its employees with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- They abide by applicable UK law concerning the maximum hours of daily labour.
- They will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conducted took place within the UK.
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to The Company, also comply to these legislative requirements.

Certification

The Company shall ensure all suppliers comply with this Policy and adhere to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

Audits

Upon request, suppliers shall demonstrate compliance with this policy to the satisfaction of The Company management. The Company may perform periodic audits on this policy and suppliers are expected to fully co-operate with any such audit.

Reporting

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting The Company's Managing Director (in his capacity as Anti- Slavery and Human Trafficking Officer).

High Risk Areas

Whilst modern slavery is not restricted to any group of people or geographic region, some areas are at a higher risk than others. The Company notes that mainland Europe and Middle Eastern regions are categorised as high-risk areas.

Consequences

The Company takes any breach of this policy extremely seriously.

Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this policy will be liable to have any supply agreement, arrangement or other contract with The Company terminated immediately, without compensation.

If a Supplier to The Company is found to be in violation of this policy, The Company will take prompt action. This may include terminating any supply agreement, arrangement, or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Managing Director shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

Monitoring and Review

This policy will take effect from 1st January 2025

The Managing Director has overall responsibility for implementing and monitoring this policy, which will be reviewed on an annual basis or on notification of change to legislation or regulation.

This policy is communicated to all persons working under the control of the company, is available upon request and is stored within the organisations management system.



Lee Mercers
Managing Director

1st January 2025

Policy to be reviewed by

1st January 2026