

## WHAT IS MODERN SLAVERY?

Modern Slavery is a term used to describe acts of slavery, servitude, forced or compulsory labour and human trafficking. Given the frequency of modern slavery and the complexity of today's supply chains, we understand our responsibility to recognise and identify these issues so that we can tackle the potential for modern slavery within our own supply chain. We are aware that modern slavery is prevalent in the construction industry, therefore we are committed to ensuring that our staff understand and are sensitive to identifying potential modern slavery situations and that our clients and suppliers join us in tackling this problem along with us.

## OUR PROCESS TO ENSURE MODERN SLAVERY DOES NOT HAPPEN;

- Undertake ongoing due diligence to identify the areas of highest risk and identify ways in which to mitigate the risks
- Conduct enhanced identity checks on all workers
- Provide training for our staff to raise awareness
- Communicate our modern slavery policy to our staff, clients, suppliers and contractors
- Communicate our procurement principles to our suppliers
- Expect our suppliers to demand the same requirements of their suppliers
- Publish official material on site to promote the facility to report modern slavery
- Instigate appropriate investigations if modern slavery is reported or suspected in our supply chain
- Report on progress and identify our next steps for continuous improvement

Our company has a zero-tolerance approach to modern slavery. This is communicated to all staff, suppliers, contractors and business partners.

## IDENTIFYING MODERN SLAVERY SITUATIONS;

Modern slavery is difficult to identify and, in many cases, even the victims do not realise that the situation that they are subjected to is one of exploitation or trafficking. There are many ways that individuals can be subject to exploitation, including;

- Domestic servitude
- Labour exploitation
- Sexual exploitation
- Criminal exploitation
- Organ harvesting

Majority of victims will be controlled by either force, threat, coercion, abduction, fraud, or deceit.

## SIGNS TO BE WEARY OF INCLUDE;

- They have moved to the UK to find work, but this appears to have been arranged for them
- The individual is not in possession of their own official documents e.g. identity documents, bank card etc. The documents may be held by a third party who will provide them to the worker for any official check but take them back immediately afterwards
- They are transported to and from work
- They do not appear to demonstrate free choice to leave site, for example, to go to a shop or cafe
- Accommodation was arranged on their behalf, and they live with other workers
- They do not appear to have accommodation and attempt to stay on site
- Their work is arranged for them by a third party
- They are reluctant to interact with others around them
- They appear dishevelled with limited clothing etc.
- Money appears to be limited although they are being paid regularly at a rate above National Minimum Wage/National Living Wage
- They do not want to discuss how they came to be working in the UK

## WHAT TO DO IF YOU SUSPECT SIGNS;

Please do not hesitate to raise any concerns or report any signs that you may notice. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of making a report under this policy.

If you suspect that a situation of modern slavery exists in our company or our supply chains, bring this to the attention of the manager. Do not question the potential victim directly as this can result in a negative outcome. Your actions will be treated in strict confidence, so please provide as much information as possible to support your concerns.

The manager will report the issue to the right authorities. The officials who investigate the issue may want to speak to you. You will be allowed to take time away from your duties to assist in their enquiries.

