Huntshaw Barton Farm, Torrington, Devon, EX38 7HH
Tel: 01805 623255 | Mob: 07831 262808

**Anti-slavery and human trafficking policy**

**Policy Statement**
This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The company strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

**Our Business and Supply Chains**

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our suppliers selection and onboarding procedure includes due diligence of the suppliers reputation, respect for the law, compliance with health, safety and environmental standards and references.

Our recruitment processes are transparent and reviewed regularly. New employees are vetted to ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

We have implemented a number of processes to ensure, as reasonably practicable, that our supply chain adheres to our expectations in respect of their workforce. Our verification process involves induction of all individuals prior to working on our sites, stati8ng that they are aware of the Modern Slavery and Human Trafficking Act 2015.

Where appropriate we require our supply chain to be either registered with Constructionline or have completed our pre-qualification process. These require our supply chain to demonstrate the steps taken to ensure that slavery and human trafficking are not taking place in any part of their business.

To ensure a high level of understanding of the risks of modern slavery6 and human trafficking in our supply chains and our business, we provide safety talk to all operatives.

**Commitments**

**Modern Slavery and Human Trafficking**

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

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**Commitments**

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the 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.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risked based approach we will also assess the merits of writing to suppliers requiring them to comply with our procedures, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our procedures
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to this policy
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our procedures.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

**Signed:**

**Print Name:** **Edward Staines**

**Role:** **Director**

**Reviewed:** **01/08/2024**

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