

## **1. INTRODUCTION**

Modern slavery is an international crime and a violation of fundamental human rights. It is a global problem that transcends age, gender and ethnicities. It may take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It permeates many aspects of the legitimate economy and the construction industry is one of the many industries in the UK targeted by traffickers and illegal/unlicensed gangmasters.

The Modern Slavery Act 2015 was introduced in the UK in October 2015 with the aim of stamping out slavery and trafficking and created a number of new criminal offences.

The purpose of this policy is provide information and guidance to all persons working for the company in any capacity on how we deal with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

## **2. OUR POLICY STATEMENT**

The company takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We expect the same high standards from all of our contractors, consultant, suppliers and other business partners. We also expect these parties to impose the same standards on their own supply chain.

## **3. POLICY APPLICATION AND COMPLIANCE**

This policy applies to all persons working for the company or on our behalf in any capacity and within any part of our business units, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers and our supply chain including all parties listed in Section 2.

All people need to read, understand and comply in all respects with this Policy.

Those who are accessing this Policy because they are either seeking to have, or already have a business relationship with the company are also advised to familiarise and comply with this Policy.

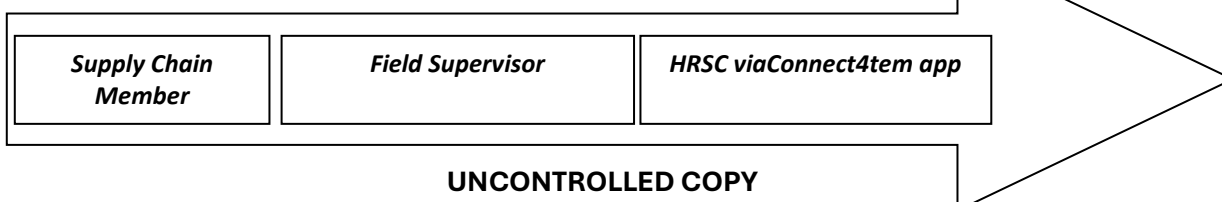
## **4. REPORTING MODERN SLAVERY**

Everyone is encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage. We encourage openness and transparency so we will support you if you raise a genuine concern in good faith, even if this concern turns out to be mistaken. We will investigate all genuine concerns which are raised in connection with this Policy and so you are encouraged to act without fear of reprisal.

The route of reporting a modern slavery concern or a suspected concern if you are an employee is outlined below:

Step	Responsibility/ Process	Owner
1	<ul style="list-style-type: none"> <li>All staff to observe any unusual behaviour which may suggest labour exploitation/ human trafficking.</li> <li>All staff to report and record key basic observations and details of their concerns HRSC are responsible for contacting the employee making the referral and complete a "Record of Potential Exploitation Form".</li> <li>HRSC to notify the General Manager.</li> <li>General Manager to notify the relevant Line Manager/Field Supervisor.</li> <li>Line Manger/Field Supervisor is responsible and will take conduct of documenting information/facts with the support (if necessary) from the HRSC. The following are examples of the information/ facts which should be collated: time, dates, persons involved, behaviour observed which raises suspicion, any patterns of behaviour, physical appearance of potential victim(s)</li> <li>A minimum period of one week observation is recommended. All of the information should then be passed to the General Manager.</li> </ul>	All, Line Manger, Field Supervisor or Site Supervisor, General Manager, HRSC
2	<ul style="list-style-type: none"> <li>General Manager is responsible for collating the information gathered and forwarding to the HRSC.</li> </ul>	General Manager
3	<ul style="list-style-type: none"> <li>Review submitted information notes, findings and evidence from the General Manager/ Contracts Manager.</li> <li>If there is likelihood based on the information collated which shows potential human trafficking and/or labour exploitation contact the GLAA, and forwarding all findings.</li> <li>Co-operate and assist GLAA Intelligence Officer with further investigations if necessary.</li> </ul>	HRSC Manager
4	<ul style="list-style-type: none"> <li>GLAA Intelligence Officer to make an initial assessment on the phone.</li> <li>Confirm if further information is required.</li> <li>Advise if no further action should be taken.</li> <li>Take over conduct of further surveillance is required.</li> <li>Advise and guide HRSC Manager as to next steps (if any)</li> </ul>	GLAA

The route of reporting a modern slavery concern or a suspected concern for all Supply Chain Members is outlined below:



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We discourage anonymous disclosures, as this can limit the investigation process. However, where a disclosure is made anonymously or a request has been made to keep the disclosure anonymous we will do everything we can to respect confidentiality.

## **5. SAFEGUARDS**

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If you think you have suffered any such treatment, please inform the HR Support Centre via [supportcentre@fortem.co.uk](mailto:supportcentre@fortem.co.uk) immediately or by using Grievance Procedure which can be found on the intranet.

## **6. COMMUNICATION AND AWARENESS OF THIS POLICY**

The company recognises its statutory obligations in connection with the Modern Slavery Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains. However, we recognise that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonable able, to prevent modern slavery from occurring:

- We will provide training on this policy to all our employee
- We will communicate our zero-tolerance approach to modern slavery and this Policy to all sub-contractors, consultants, joint venture partners and any other agents, third-party representatives and business partners at the outset of our business relationship with them and as appropriate thereafter.
- We will introduce contractual provisions for all our Supply Chain Code of Conduct requiring our supply chain to confirm their adherence to this Policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We will review this Policy annually and update it where necessary.

## **7. BREACHES OF THIS POLICY**

An activity which could lead to or suggest a breach of this Policy is strictly prohibited. It is the responsibility of all our employees, or those who sub-contract with us or work on our behalf, to ensure the prevention, detection and reporting of any possible breaches of this Policy. Breaches of this Policy will be regarded very seriously and will be sanctioned accordingly under our disciplinary procedure. In certain cases, this may even result in dismissal. This also applies where any claims or allegations which are found to be malicious or vexatious. We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

## **8. RESPONSIBILITY OF THIS POLICY**

The board of directors has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels within our business are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training.