

ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

Document Review					
Date	Revision	Prepared By		Checked By	
04.10.16	A	Name	Andrew Rafton	Name	Michael Howard
		Position	Health and Safety Manager	Position	Managing Director
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07.01.17	B	Name	Andrew Rafton	Name	Michael Howard
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Date	Revision	Prepared By		Checked By	
01.03.18	C	Name	Andrew Rafton	Name	Michael Howard
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Date	Revision	Prepared By		Checked By	
02.01.19	D	Name	Andrew Rafton	Name	Michael Howard
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Scope and training revised					
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10.01.20	E	Name	Lucie Jones	Name	Michael Howard
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09.04.21	E	Name	Andrew Rafton	Name	Michael Howard
		Position	Health and Safety Manager	Position	Managing Director
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No Change					

Scope

Howard Civil Engineering's policy is made in relation to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement which will be updated where required each year. The policy sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

Howard Civil Engineering are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in the Company or our Supply Chain. We comply with all legislation, importantly the Immigration Act 2015 – ensuring we prevent any illegal working.

A copy of this policy and any revisions to it is distributed to all employees via alerts the online portal. It is also displayed on staff notice boards and is made available to other workers on their engagement. Job seekers and applicants can access the policy via the Company's website and will be sent a copy of the policy on request. In addition, the induction process for new employees includes a briefing on this policy.

Purpose

Howard Civil Engineering are absolutely committed to maintaining and improving systems and processes to prevent human rights violations related to our own operations and that of our supply chain.

The purpose of this statement is to understand that Slavery and forced labour can take many forms, including human trafficking or child labour. This statement sets out Howard Civil Engineering actions to understand all potential modern slavery risks. As part of the construction industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking and enforce a zero tolerance approach is adhered.

Policy Statement

Howard Civil Engineering are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect our suppliers to hold their own suppliers to the same high standards.

All site team members or anyone person who are directly involved in bringing in new labour to the company have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner

such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas
- engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process using SF14 sub-contractor questionnaire) and self-reporting for our suppliers on safeguarding controls;
- introduce contractual provisions for our suppliers 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.

Responsibility for the policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Any one person at all levels who are responsible for ensuring those reporting to them understand and comply with this policy are given adequate and regular training on it and the issue of modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training to relevant members of staff. A copy of the policy is included in all subcontractor procurement packages.

At quarterly Senior Management meetings all senior management are briefed regarding any revisions to policies to in turn relay to their employees.

New and revised policies are relayed to staff during annual 'stand down' days where training on new and existing policies takes place.

References

P1 Health and Safety Policy

WWW.HSE.Gov

Modern Slavery Act 2015

Date: 09.01.22

Signed:



A handwritten signature in blue ink, appearing to read "M. T. Howard", is written over the company logo.

M T Howard - Managing Director