

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

### **Background**

Modern slavery is a crime and a gross violation of fundamental human rights. It takes 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.

Unfortunately, Modern Slavery is present within the construction industry sector in two main ways. Firstly, through unfair pay and working conditions, bribery, corruption and forced labour within the material production chain. And, secondly through onsite labour, for example, unfair conditions of employment and unfair deduction or withholding of payment

### **Statement**

At Baxall Construction We have a zero-tolerance approach to modern slavery and we are committed to acting ethically, with integrity in all our business dealings and relationships and to implement and enforcing 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 are also 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 relevant legislation. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, managers, agency workers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **Responsibility for the Policy**

The Baxall Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Baxall Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedure to ensure they are effective in countering modern slavery.

Baxall Management at all levels are responsible for ensuring those reporting to them, understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

It is the responsibility of the Baxall Buying Department to ensure our Modern Slavery commitments and requirements are included within procurement arrangements and that our Supply Chain adheres to our zero tolerance approach.

### **Compliance with the Policy**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or Managing Director or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or Managing Director via the confidential telephone helpline – 01892 831011

We aim to encourage openness and will support anyone who raised genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Managing Director immediately via the confidential telephone line – 01892 831011. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Company/Policies pool in Workspace.

### **Communication and awareness of this Policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chain, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

### **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.



**Malcolm Clarke**  
Managing Director

Dated: 1<sup>st</sup> July 2018