

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

**1<sup>st</sup> February 2020 - 31<sup>st</sup> January 2021**

### **1. Introduction**

1.1. Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. 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.

1.2. The Company produces construction materials to the UK, from two southwest sites. Aggregates, asphalt and Viafix products are produced and delivered in line with customer orders. In addition, a range of contracting services are provided by the Company.

1.3. The Company strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are 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 our suppliers to hold themselves and their own suppliers to the same high standards.

### **2. Policy Statement**

2.1. We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

2.1.1. We have a zero-tolerance approach to modern slavery in our organisation or 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.

2.1.2. We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.

2.1.3. We are committed to engaging with our direct suppliers to address and minimise the risk of modern slavery in our operations and supply chain. Evidently, in 2019, we considered the risk of slavery and human trafficking in our business and supply chain via our business risk register. Subsequently, we are conducting due diligence with all our suppliers, contractors, hauliers and business partners and creating a register of suppliers and due diligence completion.

2.1.4. As part of our contracting processes, new suppliers will be required to undergo due diligence to ensure they comply with the requirement of the Modern Slavery Act 2015.

2.1.5. Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with this policy.

### **3. Our Supply Chain**

The following list identifies the general categories of suppliers that work with John Wainwright & Co. Ltd. This list is not exhaustive, but indicative of the types of suppliers engaged with the business:

#### **UK Based**

Hauliers  
Professional advisors  
Legal advisors  
Manufacturers  
Oil and petroleum producers  
Engineers  
Computer hardware and software suppliers  
Banks and finance companies  
Insurers  
Security  
Quarries and road surfacing  
Agency work  
Plant and equipment hire  
Motor dealers and motor maintenance  
Telecommunications  
Utilities

### **4. Policy Application**

4.1. 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, interns, agents, contractors, hauliers, suppliers, external consultants, third-party representatives and business partners.

4.2. This policy does not form part of any employee's contract of employment and we may amend it at any time.

4.3. Workers must ensure that they read, understand and comply with this policy.

### **5. Responsibility for the policy**

5.1. The CEO has approved this policy and is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.

5.2. The HR Director through the CEO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

5.3. The Company is responsible for ensuring all staff comply with this policy and are given adequate and regular training on it and on the issue of modern slavery in supply chains. Training will be organised by the HR Department.

## 6. Reporting Modern Slavery

6.1. Employees must notify a member of the HR team in accordance with the Whistleblowing policy, which can be found in the staff handbook, as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy.

6.2. If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify, as soon as possible, a member of the HR team.

6.3. 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 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 own 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 a member of the HR team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## 7. Breaches of this policy

7.1. Any employee who breaches this policy may face disciplinary action, which could result in dismissal.

7.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**Approved by the Board of Directors on 29<sup>th</sup> January 2020**

Signed.....  ..... **Peter Barkwill, CEO**

Date..... **3/2/2020** .....