

# R W Services Contractors Ltd

## Modern Slavery & Human Trafficking Policy



### Introduction

The purpose of this Modern Slavery & Human Trafficking Policy is to communicate to our employees, customers, suppliers and communities we serve, our commitment to combatting modern slavery in the construction industry. We are dedicated to ensuring there is transparency in our business and in our approach to combatting modern slavery in all of our operations. We expect this same high standard from all our sub-contractors & suppliers.

### Modern Slavery Act 2015

The Modern Slavery Act 2015 is an act of the Parliament of the UK. It is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England & Wales. Section 54 of the UK's Modern Slavery Act 2015 is the transparency in supply chain provision. It requires commercial organisations operating in the UK, with an annual turnover of £36 million or more, to prepare an annual statement on the steps the company has taken, if any, to ensure slavery and human trafficking is not happening in its own business and supply chains. The statement must be approved by the board of directors and signed by a director and published on the homepage of the website of the commercial organisation.

More than 45 million people are estimated to be entrapped in modern slavery across the world. They are deprived of their freedom from the personal or financial gain to their exploiter. Slavery can take many forms the most common being domestic servitude, sex trafficking, forced labour, bonded labour, child labour and forced marriage.

### About the Policy

This policy applies to all employees, sub-contractors and suppliers. Compliance is mandatory. You must ensure that you read, understand and comply with this policy. Prevention, detection and reporting of modern slavery is the responsibility of our employees, our sub-contractors and our suppliers. You are required to avoid any activity which might suggest or lead to a breach of this policy. Breaches of policy by employees may result in disciplinary action and in the case of suppliers and sub-contractors, may result in contract termination.

If you suspect modern slavery is taking place, have any suspicions or are aware of any breaches to the policy please speak to a member of HR in confidence. Please also refer to the Whistleblowing Policy that is within the staff handbook.

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|--|-------------------------|----------------------------|
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| Effective Date: 06/2018  | Last Update: 04/06/2018 | Authorised By: J. Hallahan |
|  |                         | Next Review:31/01/2020     |

## Responsibilities

It is the managements responsibility to communicate the expected standard to our employees and ensure that they conduct themselves in an appropriate manner. This policy shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation.

R W Services Contractors undertakes to ensure that its Modern Slavery & Human Trafficking Policy and those polices which derive from it are communicated effately to directors, management, employees, sub-contractors and suppliers via inductions, noticeboards, staff handbooks and toolbox talks. Training is a fundamental way of raising awareness and ensuring that all employees, sub-contractors and suppliers understand the importance of tackling modern slavery.

## Employment

R W Services Contractors expects every one of its employees to demonstrate exemplary conduct based on integrity, fairness and respect. All staff members must refrain from behaviour that could involve themselves, other employees or the company in illegal or unfair practices.

We aim to ensure that job requirements and job criteria are clear and based only what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job. We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups and which are not justified by the demands of the job.

## Supply Chain

We are committed to working in partnership with our supply chain to tackle modern slavery and human trafficking, and to promote ethical and sustainable procurement throughout the company and the supply chain. We expect our supply chain to ensure the products they source comply with ethical standards and that they can offer full transparency.

## Whistleblowing

The Company believed that good communication amongst workers at all levels promotes better business practice. The Company will not tolerate wrongdoing by workers at any level. If a worker has a serious concern, the matter can be reported, without fear of reprisals. The purpose of this procedure is to enable the Company to investigate and deal properly and sensitively with allegations of wrongdoing, unsafe environment or practices, raised by workers.



Director - Richard Morgan

Date: 31/01/2019