

MODERN DAY SLAVERY POLICY

Modern Slavery, and how is it relevant to us

Modern slavery is a multi-faceted crime and tackling it requires many organisations and individuals to work together with an aim to eradicate it.

We have a moral duty to prevent exploitation and human trafficking, thus protecting our workforce and furthermore the reputation of our good business name.

The Modern Slavery Act 2015 recognises the important part businesses such as ours can and should play in tackling slavery and encourages all to take measures to combat this terrible crime.

We are committed to protecting and preserving the rights of our employees, those employed in our supply chain, and those affected by our operations;

Responsibilities

The Company, our managers and our colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this Policy and be aware that 'turning a blind eye' is unacceptable and simply not an option.

As a company we will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation.
- Carry out checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us.
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare.
- Be clear about our recruitment policy.
- Examine our supply chains and be clear with key suppliers about M Lambe Construction Ltd expectations regarding the Act.
- Ensure we have in place an open and transparent grievance process for all staff.
- Make a clear statement that we take our responsibilities to our employees and our clients seriously.
- Raise awareness by providing training on this subject to key personnel.

Managers

- Will receive training on this topic.
- Must listen and be approachable to colleagues.
- Will respond appropriately if they are told something that might indicate a colleague is in an exploitative situation.
- Remain alert to indicators of slavery.
- Raise the awareness and ensure all employees are provided a copy of this policy and be aware of their responsibilities.

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·Use their experience and professional judgement to gauge situations.

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority within the business, you must:

·Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure.

·Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.

·Tell us if you think there is more we can do to prevent people from being exploited.

The Risks

Construction is highlighted as a key area of risk with approximately a 3rd of victims trafficked into Labour exploitation.

We will remain vigilant throughout the supply chain both downwards and upwards of our current position.

Anti-Slavery Statement

M Lambe Construction Ltd take our responsibilities to our employees, people working within our supply chain and our clients seriously, and this is updated once a year.

Supply Chains

We make sure the companies we do business with know that we are not prepared to accept any form of exploitation.

·Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers.

·Training and knowledge sharing for key Procurement personnel.

·If any issues are identified then this is escalated to the Directors in the business.

General Recruitment

We always ensure all staff have a written contract of employment.

We always ensure staff are legally able to work in the UK.

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to. If, through our recruitment process, we suspect someone is being exploited, the HR will be informed and the HR department will follow our reporting procedures

Where the company uses labour agencies:

·The Company follows firm policy and only uses agreed specified reputable recruitment agencies.

·We expect all recruitment agencies with whom we engage to fully comply with the Modern Anti-Slavery Act 2015. and will be expected to supply a copy of their policy confirming their commitment.

·If the Company has reason to believe that any recruitment agency has failed to meet these standards, HR should be informed and any contracts with them will be terminated.

Identifying Slavery

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There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it to the HR Department who will follow our reporting procedures.

Reporting Slavery

- Talking to someone about your concerns may stop someone else from being exploited or abused.
- If you think that someone is in immediate danger, dial 999.
- Otherwise, you should discuss your concerns with the Human Resources Manager who will decide a course of action which may include contacting the Police or the Gangmasters Licensing Association (GLA) on 0800 432 0804
- Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the Human Resources Manager before taking any further action.

Training

We ensure that all employees are made aware of this policy, and their obligation to comply with this policy.

This will include training being provided to key personnel and decision makers.

Monitoring Our Procedures

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

Activities covered by the MSA Act:

Slavery

Exercising powers of ownership over a person.

Servitude

The obligation to provide services is imposed by the use of coercion.

Forced or compulsory labour

Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.

Human trafficking

Arranging or facilitating the travel of another person with a view to their exploitation.