

STRATEGIC GROUP POLICY SGP008



LEADERSHIP

MODERN SLAVERY & HUMAN TRAFFICKING

Written by: Liam O'Loughlin

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Reviewed by: Andrew Smith

VISION:

Our Vision: "To ensure all people working for, or on behalf of, the Company are legally entitled to so in an ethical, fair and transparent manner"

We are realising our Vision by carrying out the relevant due diligence checks whenever someone new works for the Company either internally or as part of our supply chain.

COMMITMENT:

The Directors of Arthur Civil Engineering recognize that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the "Act").

Arthur Civil Engineering is fully committed to preventing unethical labour practices occurring in any part of its business or in any part of its supply chain. This Policy applies to all Arthur Civil Engineer employees as well as, suppliers and joint venture partners, who must ensure that both their businesses and supply chains worldwide comply with this Policy.

Arthur Civil Engineering will take steps to ensure that labour abuses including, modern slavery and human trafficking are not taking place in its business or within its supply chain and will ensure that all people employed either directly or indirectly have the legal entitlement to be working in the UK.

To support this statement Arthur Civil Engineering will ensure that:

- Suppliers comply and act in accordance with this Policy.

- That its strategic and preferred supplier base must be able to demonstrate that it complies with this policy by submitting a pre-qualification document in which the Act is contained.
- All recruitment is carried out in a fair and transparent manner and will comply with the relevant legislation and standards.
- The requirements and expectations made of the supply chain in relations to the Act will be clearly communicated and included within contractual terms.
- Suppliers comply with the Immigration, Asylum and Nationality Act 2006.
- The Company takes a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across all of the sectors and industries in which it operates.
- Staff are appropriately trained to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

RESPONSIBILITY:

Every Arthur Civil Engineering employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to the Directors of Arthur Civil Engineering who will take the appropriate action accordingly.

APPROACH:

Arthur Civil Engineering considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Arthur Civil Engineering will notify the relevant authorities of an individual or supplier’s contravention of the Act.

REVISION STATUS:

	Rev.	Date	Description if Addition (A), Deletion (D) or Substitution (S)	Approved by:
1.1	01	20/02/2021	Written by Liam O’Loughlin	Andrew Smith
1.2	02	08/02/2022	2022 Review	Andrew Smith
1.3				

The information contained in this Policy applies to all employees of Arthur Civil Engineering Limited ('Arthur Civil Engineering Ltd' or 'the Company') subject to any qualifying conditions described. This policy should be read in conjunction with your Contract of Employment and the Company Handbook. The Company may amend and extend the contents of this document at any time, subject to statutory and/or operational requirements. If you require any clarification in respect of this Policy, please speak in the first instance to one of the Directors.