

## Anti-Slavery and Human Trafficking Policy

### Policy Statement

Modern Slavery is a crime and a violation of fundamental human rights. Modern Slavery includes:

- Slavery
- Servitude
- Forced / Compulsory labour
- Human Trafficking
- Any other deprivation of a person's liberty to create a personal or commercial gain

Hobson & Porter take a zero-tolerance approach to modern slavery. We are committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any part of our business. We act ethically and with consistency and integrity in all our relationships with our stakeholders, ensuring systems and controls prevent slavery and human trafficking within our business and throughout our entire supply chain, in addition to any association with our projects.

Hobson Porter undertakes due diligence when considering appointing new suppliers, and regularly conducts performance reviews on its existing suppliers. From the start we set clear our expectations and evaluate the modern slavery and human trafficking risks of each new supplier, both at initial appointment and on a project-by-project basis. We invoke sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship where applicable. All of our policies, procedures and evaluation models are pursuant to section 54(1) of the Modern Slavery Act 2015.

The policy applies to all persons working for Hobson & Porter, on our behalf, or in any capacity associated with our business. This includes:

- All employees\*
- Directors
- Officers
- Agency Workers
- Seconded Workers
- Volunteers
- Interns and work experience
- Agents and contracted staff
- Consultants and advisors
- Business Partners

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

## **Responsibility for the Policy**

The appointed board of directors listed on companies house have overall responsibility for ensuring this policy complies with our legal and ethical obligations, including any person or organisation under our control.

Our HR Director and HSQE manager have joint primary and day-to-day responsibility for implementation, continually measuring its use and effectiveness. All internal audits and controls are undertaken by these individual.

Management throughout the business are responsible for ensuring the policy is cascaded and complied with, including regular training given to all staff, especially those involved in the management and appointment of suppliers and subcontractors.

## **Compliance**

1. You must read, understand and comply with this policy
2. Prevention, detection and reporting of any event or instance which may be deemed as modern slavery, in any part of our business or supply chain is the responsibility of anybody appointed to work on behalf of the company, directly employed or otherwise appointed. You are required to identify, avoid and report anything which may be classified as a breach of this policy.
3. You must notify you line manager and HR/HSQE department immediately if you believe or suspect a conflict of this policy has, or may occur.
4. You are encouraged to raise concerns as soon as possible and will be appropriately protected in a confidential, anonymous nature for doing so.
5. If you are unsure if a suspicious event constitutes modern slavery, please raise it with your line manager immediately.

## **Communication**

A large proportion of our projects require subcontract organisations to carry out works and services on our behalf, including the sourcing of materials and manufactured products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

As part of our initiative to identify and mitigate risk:

1. We create long-standing relationships with our suppliers and subcontractors and make clear our expectations of business behaviour.
2. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
3. Our policy forms part of our induction process for all individuals who work for us at any location or project site, this includes initial employee inductions and site inductions.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All directors have been briefed on the subject.

### **Breaches**

Any employee or appointed person who breaches this policy will face disciplinary action. Employees or appointed persons/organisations may be suspended immediately pending further investigation.

We may terminate relationships with employees, individuals and organisations working on our behalf if they are proven to have breached this policy.

Signed:

A handwritten signature in black ink, appearing to be 'D. Blades', written over a light grey horizontal line.

Director: Dave Blades, Business Development Director

Date: 7<sup>th</sup> December 2016