

INTRODUCTION

This policy sets down Hobson & Porters commitment to preventing slavery, human trafficking and illegal workers in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery, human trafficking or illegal workers in our own business and supply chains.

DEFINITION OF MODERN SLAVERY

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.

SCOPE

This 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 and work experience;
- Agents and contracted staff;
- Consultants and advisors;
- Business Partners.

POLICY

Hobson & Porter recognise that the execution of our services involves labour being procured throughout our business and supply chains and understand that this entails the risk that modern slavery may take place.

We acknowledge that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business undertakings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chains.

In adhering to this policy, in particular we will: -

- Include, as part of our contracting processes within our supply chain, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever forms, or may be, taking place in any part of our own business or in the businesses of any of our supply chains.

ILLEGAL WORKING

Hobson & Porter carry out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006.

Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

Documents used to verify right to work are compliant with the Home Office Guidance for Employers on Preventing Illegal Working and are retained for a minimum of 2 years after the individual has ceased employment with the Company.

RESPONSIBILITY

Hobson & Porter's Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, including any person or organisation under the Company's control.

Our HR Director and SHEQ Department 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 individuals.

Management throughout the business are responsible for ensuring the policy is cascaded and complied with, especially those involved in the management and appointment of suppliers and subcontractors.

TRAINING & AWARENESS

Hobson & Porter provides essential training for all employees and directors to provide a detailed understanding of the risks of modern slavery, human trafficking and illegal workers on our business and supply chains.

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 chains is the responsibility of anybody appointed to work on behalf of the company, directly employed or otherwise appointed.
- 3. You must notify your line manager, HR/SHEQ 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 of a suspicious event constitutes modern slavery, please raise it with you line manager immediately.

BREACHES

Beaches of this policy will be dealt with under Hobson & Porter’s disciplinary procedures and could lead to dismissal in applicable circumstances.

COMMUNICATION

This policy is communicated in line with our Communications Policy to all employees, our supply chain and to any other interested parties upon request. Revisions will be communicated to those affected by the changes.

Stakeholders are expected to co-operate and assist in the implementation of this policy.

REVIEW

This policy and supporting processes are pursuant to section 54(1) of the Modern Slavery Act 2015 and shall be reviewed annually for each financial year or after changes in legislation and operations, whichever occurs first.



Jacquie Blades

HR Director
Hobson & Porter Limited

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