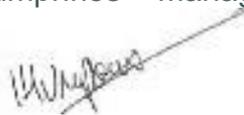


Anti-Slavery and Human Trafficking Policy

BOULTING

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Signature:



Anti-Slavery and Human Trafficking Policy

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Anti-Slavery and Human Trafficking Policy

1. Policy Statement

In accordance with our vision and values, it is our policy to conduct all of our business in an honest and ethical manner.

- 1.1 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.
- 1.2 We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. About this Policy

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, sub- contractors, external consultants, third-party representatives and business partners.
- 2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Who must comply with this Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Josh Groarke, Junior Managing Director is the company's Compliance Manager. He can be contacted on telephone number 01925 446000 or by email joshgroarke@boulting.co.uk

- 3.1 The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 3.3 You must ensure that you read, understand and comply with this policy.
- 3.4 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are

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required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 3.5 You must notify your line manager OR the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.6 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.7 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or the compliance manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.8 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the compliance manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure which can be found on our company intranet BEN.

4 Communication and awareness of this policy

- 4.2 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.
- 4.3 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 Breaches of this policy

- 5.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.3 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6 Interaction with other Workplace Policies and Procedures

- 6.1 This Anti-Slavery and Human Trafficking Policy interacts with the following workplace policies and procedures which can be found on the company intranet BEN. All those to whom this policy applies are encouraged to familiarise themselves with the policies detailed below. If you have any queries please contact the compliance manager, Josh Groarke or a member of

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the HR team.

7 Definitions

Slavery

- The state or condition of being a slave; a civil relationship whereby one person has absolute power over another and controls his life, liberty, and fortune
- The subjection of a person to another person, in being forced into work
- The condition of being subject to some influence or habit
- Work done in harsh conditions for low pay

Servitude

- The state or condition of a slave
- The state or condition of being subjected to or dominated by a person or thing
- (law) a burden attaching to an estate for the benefit of an adjoining estate or of some definite person

Forced and compulsory labour

- Labour done because of force; compulsory labour

Human Trafficking

- Human trafficking is the trade of humans, most commonly for the purpose of sexual slavery, forced labor, or commercial sexual exploitation for the trafficker or others

Child Labour

- The employment of children in an industry or business, especially when illegal or considered exploitative.

References and Associated Documents

Whistleblowing Policy:
Corporate Social Responsibility (CSR Policy)
Grievance Policy
Procurement Procedures

Revision Details

Issue 1 – February 2016

Issue 2 – January 2018

The following changes were made:

The company's name throughout the policy was changed to Boulting Ltd, to reflect the change in company name from 1st February 2018.

The links in the policy were amended and updated to our company intranet BEN.

To include a definition of Child Labour.