

Haddington Contracting Ltd Anti-Slavery and Human Trafficking

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Related Regulations	Modern Slavery Act 2015
Annexes and Supplementary Info	None
Responsible Person	James Haddington
Responsible Person Signature	

Anti-Slavery and Human Trafficking Policy

1. Introduction

- 1.1 The Company maintains relationships with many different organisations in its supply chain, as well as directly employing people. In the light of the general law on employment and human rights, and, more specifically, The Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.
- 1.2 The Company has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

2. Scope

- 2.1 The Anti-Slavery and Human Trafficking policy aims to promote and implement the policy by;
 - 2.1.1 Ensuring compliance with all relevant legislation.
 - 2.1.2 Ensuring corrective action is taken because of any misconduct identified.
 - 2.1.3 Collating information about any significant trends in terms of corrective action that is necessary.
- 2.2 This policy applies to all employees, contractors and agency staff working on company premises.
- 2.3 We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with our anti-slavery value and to always act in a way which is consistent with our anti-slavery value.
- 2.4 Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of the Company, with the aim of the prevention of opportunities for modern slavery to occur within our businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.
- 2.5 We have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.

3. Responsibilities

3.1 Managing Director Responsibilities

- 3.1.1 Overall responsibility for the prevention of modern slavery and ensuring full implementation of the policy and procedures laid out by the company.
- 3.1.2 Carry out full investigation on any suspected modern slavery acts.

3.2 Administration Coordinator Responsibilities

- 3.2.1 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.
- 3.2.2 Assist the managing director with all investigations.

3.3 Employees Responsibilities

- 3.3.1 Adhere to the policy and procedures laid out at all times.
- 3.3.2 Report anyone not adhering to the policy to their managers immediately.

4. Policy

4.1 Prevention

- 4.1.1 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:
 - 4.1.1.1 Engage with suppliers, both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
 - 4.1.1.2 Where appropriate, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
 - 4.1.1.3 Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

4.2 Identification

- 4.2.1 Modern slavery could be found in our business, our supply chains, and any outsourced activities, so it important all employees know how to identify it so it can be resolved.
- 4.2.2 Not all victims realise they have been exploited, and they are entitled to help and support, especially when there is no typical victim of modern slavery, so identifying there is an issue can be problematic. However, the following key signs could be an indication someone may be victim of modern slavery, human trafficking or forced labour.
 - 4.2.2.1 The person is not in possession of their own identification, such as passports or travel documents.
 - 4.2.2.2 The person does not appear to be in possession of their wages as they seem to be paid into a bank account not within their name, which may mean they are being held by a debt bondage.
 - 4.2.2.3 The person appears to be under the influence of another individual and controlled.
 - 4.2.2.4 The person is working excessive hours regularly.
 - 4.2.2.5 The person allows others to speak for them even if they have directly been asked a question.
 - 4.2.2.6 The person appears to be regularly dropped off and collected from work.
 - 4.2.2.7 The person appears frightened, withdrawn, and unengaged with social interaction.
 - 4.2.2.8 The person does not appear to be able to contact friends and family freely.
 - 4.2.2.9 There are signs the person may have abusive working or living conditions.

4.3 Reporting

- 4.3.1 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 no one suffers any detrimental treatment as a result of reporting in good faith 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.
- 4.3.2 Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.
- 4.3.3 The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.
- 4.3.4 Any claims or allegations made which are found to be malicious, will result in disciplinary action being taken against the individual.

4.4 Breaches

- 4.4.1 Any employees who breach this policy and procedures in place within the company as a result of the policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.4.2 A relationship with a supplier or subcontractor may be terminated as a result of breaching this policy unless they are willing to work with our company to resolve issues indicated.

5. Training

- 5.1 All Employees will receive thorough training and information on modern slavery and human trafficking at the beginning of employment, and this will be regularly updated during employment through internal training such as toolbox talks.
- 5.2 External training will be provided as required.
- 5.3 Anyone in management who are responsible will also be given appropriate training to a suitable level.

6. Monitoring and Review

- 6.1 Following initial adoption, the Anti-Slavery and Human Trafficking Policy will be reviewed at least annually, or more often if required, when there are changes in legislation or the like.