

We abide by the four core labour standards as enshrined within the International Labour Organisations (ILO) Conventions:

- **Freedom from forced labour**

(enshrined in Convention 29 on Forced Labour (1930) and Convention 105 on the Abolition of Forced Labour (1957)).

- **Freedom from child labour**

(enshrined in Convention 138 on Minimum Age for Entry into Employment (1973) and Convention 182 on the Worst Forms of Child Labour (1999)).

- **Freedom from discrimination at work**

(enshrined in Convention 100 on Equal Remuneration (1951) and Convention 111 on Discrimination in Employment and Occupation (1958)).

- **Freedom to form and join a union, and to bargain collectively**

(enshrined in Convention 87 on Freedom of Association and Protection of the Right to Organise (1948) and Convention 98 on the Right to Organise and Collective Bargaining (1949)).

We prohibit the use of forced labour, bonded labour, prison labour and child labour within our company or those that supply to or sub-contract for us. This includes procuring commercial sex acts during the length of the contract, slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, child labour and internal or international trafficking. Workers and those closely associated with them will not be subject to harsh or inhumane treatment, physical punishment, psychological or sexual violence, coercion, abuse, harassment, or intimidation.

We ensure that all of our employees work voluntarily for us and are not intimidated, threatened, mentally or physically coerced to enforce employment or to work. Also, that they retain their rights and privileges.

Concise records are processed, collated and retained for employees, in accordance with the Data Protection Act and General Data Protection Regulations to satisfy compliance to employment acts and regulations, policy and directives.

Each workers have a work contract. This is a written document in easy-to-understand format and language understood by employees, clearly defining the terms of engagement / employment for each worker and setting out their rights and obligations. Wages, overtime pay, payment periods, working hours, rest breaks, holidays, period of notice for terminating employment will be in accordance with applicable laws, any collective agreements and meet industry standards. Workers can cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with above.

An appraisal system ensures that the employee is fairly treated and has 'a voice' to represent themselves and to notify of any contravention with the directives of this policy. A grievance policy and process are also in place. It will not be detrimental for anyone to file a grievance and no retaliation or victimisation will be tolerated for those raising one.

Modern Slavery and Young Worker Policy

Where there is a benefit to the company to employ a young worker (through an apprenticeship), we ensure that we uphold relevant statutory requirements, that they continue to have access to further education (apprenticeships) to improve their qualification and skills and that they will not work in any hazardous environment, above the legally acceptable weekly hours and not at weekends or at night. The process that follows this policy explains how we ensure that we enforce this.

Receipt and review of official documented evidence of right to work in the UK for all employees prior to employment and an additional date of birth check (i.e. Passport, Birth Certificate, National Identity Card or Driving Licence) is a pre-requisite for young workers / Juveniles and also to confirm the right to work in the UK. We will not withhold or confiscate any official document, property or identity to prevent or restrict any employee's free movement nor create workplace slavery. Likewise, we will not charge workers any fees or costs associated with recruitment nor require them to make payments, security payments or repayment of debt through work, either directly or indirectly, which can have the effect of creating workplace slavery.

Where it is determined, following employment, that the Young Labourer or Juvenile is actually child labour, we will endeavour to resolve the issue amicably with the parent / guardian's involvement which may include agreed financial assistance and subject to vacancy, will always include re-employment at the minimum working age should the child want it.

Managers who are responsible for employee recruitment and monitoring procedures associated with forced labour, bonded labour, prison labour and child labour or supplier chain implementation and evaluation are given training, guidance and instruction to ensure that they understand the law, the processes and can effectively administer its directives.

We have procedures in place to ensure that we maintain this policy and ensure that our suppliers and Partners do likewise. Quarterly reviews and where necessary subsequent meetings are held by the General Manager who is the designated responsible person, to ensure that we are monitoring this policy and associated procedures and to discuss any issues or complaints relevant to them.

Workers employed via a third party will be reputable and hold the necessary licences, registrations and insurances. There is a supplier code of conduct which all suppliers receive. They will be expected to adhere to its principles for compliance to the Modern Slavery Act. Suppliers who do not uphold the code are removed from our approved suppliers list as part of our BS EN ISO9001 standard.



Simon Riley
Managing Director

Young Worker Process

Please note, recruitment, employment and probation is covered in section 12.

Note 1 –

Child labour is defined as the recruitment, hiring and employment of workers under the minimum working age or the age of 15, whichever is higher.

Young labour is defined as the employment of workers of at least the minimum working age but younger than 18.

Inform Child that cannot employ and refer to website for **Modern Slavery & Young Worker policy**. If area and activity allow, work experience can be granted

Advert for Young Labour / Juvenile or request for work experience received - see note 1.

Receive and review 2 official documents to determine age (i.e. **Passport, Birth Certificate, National Identity Card or Driving License**)

NO Minimum working age met?

YES

Photocopy **Passport, Birth Certificate, National Identity Card or Driving License** and hold on employee file

Assess the risks against prospective young labourer prior to starting work (**Young Person's Risk Assessment Form**) - (see note 2)

Does the Juvenile need to carry out certain risk work as part of their training – (see note 3)?

YES

Review criteria and controls

NO Risks / Supervision acceptable?

YES

Raise **Young Labour Terms and Conditions of Employment / Work Experience Agreement**– (see note 4) and obtain signature (parent / guardian also requested to sign). Signed copy to employee file

Inform young person of risk assessment & findings. Provide copy of **Risk Assessment Form** to Parent / Guardian

YES Are health surveillance checks commensurate with activity / work area?

NO

Arrange **Medical Questionnaire** completion and initial health check

Note 2 - Young labour is restricted to equipment / work area in accordance with HSE INDG364. Consider factors such as, inexperience immaturity & lack of appreciation of risk. Fitting & layout of the workplace and lifting capability. Harmful exposure to physical, chemical & biological agents such as toxic or carcinogenic materials and radiation. Working at height. Exposure to extreme cold, heat, vibration and noise. Risk of accident that cannot be easily recognised or avoided, where complex safety instruction have to be followed and where risks are unlikely to be appreciated, when the safety of others rest with the young labour. The use of work equipment. Health & Safety training.

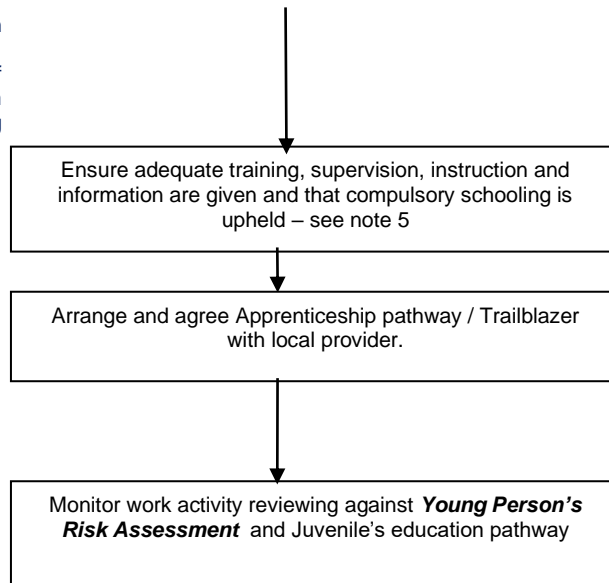
Note 3 –They can only be exposed to the following risks:

- the work is necessary for their training;
- the work is properly supervised by a competent person;
- the risks are reduced to the lowest level, **so far as reasonably practicable**

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Note 5 - Include information on emergency procedures, persons in charge of evaluation and risks from other employees sharing the work site

Note 4 - **Terms and Conditions of Employment** clearly reference no night shift working, no working in hazardous areas. Also the restriction of equipment / work area in accordance with HSE INDG364 (i.e. working at height, harmful exposure to dangerous substances such as toxic or carcinogenic materials and radiation or extreme cold, heat, vibration and noise. Risk of accident that cannot be easily recognised or avoided, where complex safety instruction have to be followed and where risks are unlikely to be appreciated, when the safety of others rest with the young labour).



NO

Is it discovered that the Juvenile is a Child?

YES

Inform parents / guardians of **Modern Slavery & Young Worker policy**