

Modern Day Slavery and Trafficking Act 2015 Policy Statement

July 2018

Chalcroft Limited is absolutely committed to preventing slavery and human trafficking in all of our corporate activities and to ensuring that our supply chains, or any part of our business, are free from this.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our aim is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to their line management, who are then expected to act upon them.

We are a Principal Contractor and our portfolio of company activities are varied in areas and sectors such as:

- food factory construction and refurbishment
- clean room construction
- warehouse construction and refurbishment
- temperature controlled facilities and cold store construction
- distribution centres
- retail and commercial schemes
- special projects and building services

We therefore have a multi-disciplined supply chain to support us through the different aspects and requirements of our business.

Our Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007.

Additional procedures ensure that this policy is understood and communicated to all levels of the company and that it is reviewed on an annual basis by the Group Human Resources Manager to ensure its continuing suitability and relevance to the company activities.

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):-

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit and review our practices for checking all employees are paid at least the minimum wage and have the right to work in the UK.
- We encourage the reporting of concerns and the protection of whistle blowers.
- We will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

- 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.

We undertake the following to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain:

- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations, this is detailed in the Chalcroft Limited Purchase Order and the Chalcroft Limited Sub Contract Order; and
- Reinforcement of our requirement by insisting that all of our subcontractors sign up and adhere to the Chalcroft Prequalification Questionnaire.

Relevant policies

We operate the following policies to be able to enforce our approach to the identification of modern slavery risks:

- Whistleblowing Policy. We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chain of the Company.
- Supplier/Procurement code of conduct. We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We communicate with suppliers to ensure that they meet our expectations. Serious violations of this will lead to the termination of the business relationship.
- Recruitment/Agency workers. We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency, this includes asking to be provided with a copy of their policy to ensure that it is up to date and current.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Chalcroft Limited's slavery and human trafficking statement.

For transparency we will publish the Modern Day Slavery and Trafficking Act 2015 Policy Statement on our website for our employees, clients, public, sub-contractors, suppliers, employees and non- government organisations to view.

This policy applies to all those employed by Chalcroft Limited.

Paul Morley
Managing Director
Chalcroft Limited

Steve England
Managing Director
Special Projects and Building Services

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