

# Modern Slavery and Human Trafficking Policy

## Aim of Policy

The Company adopts a zero-tolerance approach to slavery and human trafficking. The aim of this policy is to communicate the steps taken by the Company ensure that slavery and human trafficking is not present either in our business or in our supply chains.

We are committed to ensuring that workers are not exploited, that they are safe and that relevant employment standards (including pay and working time) and health and safety and human rights laws are adhered to.

We expect the same standards from our suppliers and are committed to working closely them to ensure that slavery and human trafficking risks are identified and managed proactively.

## What is Modern Slavery?

'Modern Slavery' is a term used to encapsulate the following two offences in the Modern Slavery Act:

- Slavery, servitude and forced or compulsory labour;
- Human trafficking.

The key element of slavery is the offender acting as if he/she 'owned' the victim, which deprives them of their freedom.

Servitude is the obligation to provide services by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Forced or compulsory labour involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from a person under the menace of a penalty of some kind. The person has not offered him/her self voluntarily for this work or service.

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited, even where the victim consents to the travel. A victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

Work given by Morris & Spottiswood is done so on the understanding that all organisations meet the requirements placed on them by The Modern Slavery Act 2015. In particular: -

- An obligation for subcontractors, suppliers and professional advisers to comply with the Modern Slavery Act;
- A specific prohibition on engaging in slavery or human trafficking and to respect human rights, including children's rights;
- The ability to provide a complete set of records evidencing due diligence, audit processes and programmes implemented, including the findings of such processes and programmes in order to demonstrate compliance with the Modern Slavery Act, and that such records be made available to Morris & Spottiswood upon request
- An obligation to comply with any audit procedure implemented by Morris & Spottiswood in order to enable the business to implement / prove adequate due diligence;
- An obligation to notify Morris & Spottiswood as soon as it becomes aware of any actual or suspected slavery or human trafficking either by that supplier or in its supply chain whether before or after the agreement comes into effect;

- A warranty that the supplier has not been convicted of any offence involving slavery or human trafficking;
- A warranty that, to the best of its knowledge, the supplier has not been or is not the subject of any investigation by any regulatory body in connection with slavery and/or human trafficking; and A right of early termination for failure to comply with applicable laws and this policy.
- We will engage subcontractors that are members of a certified industry organisation.

The Modern Slavery Act 2015 requires certain companies to publish an annual slavery and human trafficking statement. We have published our Modern Slavery Act Transparency Statement on our website and it is appended to this policy for your information.

### How do I recognise if anyone is at risk?

- **PHYSICAL APPEARANCE** - Victims may show signs of physical or psychological abuse, and look malnourished or unkempt.
- **ISOLATION** - Victims may rarely be allowed to travel on their own and seem under the control or influence of others.
- **FEW OR NO PERSONAL EFFECTS** - Victims may have no identification documents and few personal possessions. They may wear the same clothes every day and what clothes they do wear may not be suitable for their work.
- **RESTRICTED FREEDOM OF MOVEMENT** - Victims have little opportunity to move freely and may have had travel documents or passports removed.
- **UNUSUAL TRAVEL TIMES** - They may be dropped off or collected for work on a regular basis either very early in the morning or late at night.
- **RELUCTANT TO SEEK HELP** - Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcement. They may not know who to trust or where to get help, fearing deportation or violence against them or their family.

### Your responsibilities

As an employee, you are expected to read, understand and comply with this policy. 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 required to avoid any activity that might lead to, or suggest, a breach of this policy. The following points should be noted:

- You must notify your line manager or the HR Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 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 at the earliest possible stage.
- 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 HR Director as soon as possible.
- 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 HR Director.

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.

It is worth noting that migrant workers form an essential resource to the construction sector these days and most are legally allowed to work here, employed in decent conditions, well paid and managed appropriately. However, some may not be. We need to be sure we don't mix up thinking about immigration and slavery. A person may be legally allowed to work here but that does not mean they have not been trafficked and held in slavery conditions.

### Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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.

#### Since the Modern Slavery Act 2015 came into force, we have:

- conducted a risk assessment in our business and in our supply chains (see the Company's Modern Slavery Act Risk Assessment)
- identified key individuals within the business with responsibility for compliance
- briefed other relevant teams within the business to support compliance (see the Company's Modern Slavery Act – Site Team Requirements)
- created an Anti-Slavery Policy, which has been approved by our Board of Directors
- reviewed our existing supplier due diligence processes
- updating our supplier terms and conditions
- identified Key Performance Indicators to benchmark our compliance efforts

We set out below details of further particular steps the Company will take to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains.

#### ▪ **Recruitment practices**

All employees joining the company will undergo a pre-employment vetting process which includes identity and background checks, both to ensure they have the right to work in the UK, and to protect the business and our clients in the event of the individual working in sectors which involve security risks. New employees will be receiving training on this policy and their responsibilities during the induction process.

#### ▪ **Employee awareness**

We take our responsibilities under the Modern Slavery Act 2015 seriously. This policy will be circulated to all existing employees via internal communication processes and on construction site noticeboards. Employees and any other persons who read this policy are required under the policy to report any breaches of the Modern Slavery Act 2015 to the HR Director.

To ensure that our key decision makers have a high level of understanding of the risks associated with modern slavery and human trafficking, we are committed to providing the appropriate levels of training. All employees who have direct involvement with our Supply Chain have been fully briefed on this matter via in-house training.

- **Monitoring**

The company complies with pay related legislation including the UK national minimum wage and the UK national living wage.

Our Health & Safety Business Partners oversee the Company's compliance with health & safety legislation on our operational sites, including the welfare of site workers. Any aspect of slavery, servitude or forced labour to employees on site would not meet the requirements of our regular site audit processes.

## Governance of this policy

The Trading Board have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Our HR Director and Business Compliance Director have 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.

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.

## Our Supply Chain

We expect our suppliers and other business partners to have the same high standards in promoting safe and fair working conditions. Our Supply chains include companies who supply raw materials, specialist trade contractors that undertake supply and fix contracts, labour-only subcontractors and specialist professional organisations that provide a range of services across the portfolio of projects we deliver for our clients. The following steps have been taken to support the compliance with all aspects of the Modern Slavery Act 2015.

- The Company's Sub-Contractor approval process, which is activated before a Sub-Contractor is permitted to work on any of our sites was amended in 2016 to include the following question:  
"Your appointment as a Morris & Spottiswood Sub-Contractor is conditional upon your organisation meeting the requirements of the Modern Slavery Act 2015. Can you confirm that your organisation satisfies these requirements?"
- Our standard terms and conditions of engagement with Sub-Contractors have been amended to include reference to The Modern Slavery Act 2015, specifically stating that:  
"Work given by Morris & Spottiswood to you as a Sub-Contractor is done so on the understanding that your organisation meets any requirements placed on you by The Modern Slavery Act 2015. Failure to do so may result in the termination of your engagement with Morris & Spottiswood. Morris & Spottiswood will not be held liable in any way for any failing on your part with regard to The Modern Slavery Act 2015".
- Prior to the commencement of a project, a meeting is held with the Sub-Contractors appointed to it. A standard format is applied to produce a minute of understanding between the two parties. This format has been amended to include reference to The Modern Slavery Act 2015.

- We have also introduced a process of contacting our top twenty Sub-Contractors by spend to determine their policy on The Modern Slavery Act 2015 and to determine what actions they have taken to meet the Act's requirements.
- Our Terms and conditions accompanying all purchase orders placed now include a reference to The Modern Slavery Act 2015, specifically stating that "This order is placed on the understanding that the supplier meets the requirements of The Modern Slavery Act 2015."
- Professional advisers (Architects, Lawyers, Project Management Consultancies, and Chartered Surveyors etc.) engaged by Morris & Spottiswood on a regular basis will be engaged under the same process as other suppliers. The Company commits to regularly review the supply chain processes outlined above to ensure their effectiveness in preventing slavery and human trafficking in the supply chain.

### Key performance indicators (KPIs)

We use the following KPIs to measure how effective we have been in combatting slavery and human trafficking:

- Measure supplier resistance to agreeing our business terms on modern slavery
- Employee confirmation that they have read and understood our Anti-Slavery Policy
- Policy breaches are reported internally within 3 business days of occurring
- Policy breaches are assessed within a week of being reported and further investigations concluded as soon as possible thereafter

The KPI's will be subject to ongoing review by the Trading Board to ensure their continued effectiveness.

### Consequences of breaching this policy

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Company's Disciplinary procedure. We may terminate our relationship with other workers, suppliers and any other associates working with Morris & Spottiswood Ltd if they breach this policy.

### Scope of Policy

This policy is intended for all employees, its revision effective from the approved date shown below. It will remain in place until further notice. Morris & Spottiswood Ltd reserves the right to amend this policy at any time.

(Please also refer to other relevant policies and procedures, including the Ethics policy; Grievance policy; Recruitment & Selection policy; and Whistle-blowing policy.)

### Supporting Documents

- Modern Slavery Act Transparency Statement
- Modern Slavery Act – Morris & Spottiswood Site Team Requirements
- Modern Slavery Act – Risk Assessment