

Groundsell Contracting Limited

Modern Anti Slavery Policy

Policy No

23

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). 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.

A key purpose of this Legislation is to prevent modern slavery in businesses and their supply chains. A means to achieve this is to increase transparency by ensuring the public, consumers and employees know what steps the business is taking to tackle modern slavery.

The company’s slavery and human trafficking policy will be a public document.

Groundsell Contracting Limited Policy will demonstrate how we are starting to act on the issue and our planned actions to investigate or collaborate with others to effect change.

This policy demonstrates the company’s due diligence in relation to slavery and human trafficking.

Groundsell Contracting Limited is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy 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

Ensuring that slavery and human trafficking is not taking place in our business or supply chains. Our supplies will be required to provide information in the form of a questionnaire to ensure their ethical standards are in line with that of Groundsell Contracting Limited.

The company shall implement a programme of training for managers and staff about slavery and human trafficking.

The Act requires each organisation to publish a slavery and human trafficking policy. The purpose of this measure is to increase transparency and it is vital that the statement can be easily accessible by anyone who wants to see it – the public, consumers and employees.

A copy of this policy is to be provided to anyone who requests one in writing. The copy must be provided to the requestor within 30 days of the receipt of the request, where a statement has been produced and is available.

. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk –

- Where viable, we run our company to ensure optimum control of the work environment;
- We limit the geographical scope of our operations to ensure optimum supervision
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;

- With regards to national supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us to have a direct relationship with all links in the chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. Managers are responsible for compliance in their respective departments and for their supplier relationships.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff. All managers have been briefed on the subject.

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The managing director of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers are responsible for ensuring those reporting to them understand and comply with this policy.

ACTIONS TO REPORT MODERN SLAVERY OR PURPOSE OF THIS POLICY

This document sets out the policy of Groundsell Contracting Limited with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

As a company, 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 business or those of our suppliers.