

## **Anti-Slavery and Human Trafficking Policy**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. We have a zero-tolerance approach to modern slavery and 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 in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **Responsibility for the Policy**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director has 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 advice, guidance and literature internally by trained personnel and sourced from UK government <https://www.gov.uk> website on the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to a company Director.

### **Compliance with the Policy**

You must ensure that you 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.

You must notify a 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 tier 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 a Director or report it in accordance with our Policy 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.

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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the quality assurance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

### **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.

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.

### **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

A handwritten signature in black ink, appearing to read "Chris Bartram", with a long horizontal flourish extending to the right.

**Chris Bartram**  
Managing Director

Date: 22nd February 2019

## Slavery and Human Trafficking Statement

Collins Construction is committed to improving practices to combat acts of modern day slavery and human trafficking from within its own business and that of its supply chain.

## Company Structure

Collins has been established since 1956 and our core business is the provision of refurbishment and fit out services to commercial property owners, landlords and occupiers. We deliver projects up to £20 million under most forms of contract within the commercial office, healthcare, and leisure sectors. Most of our projects are carried out in London.

## High Risk Areas

Subcontracted labour: Collins Construction is primarily a management company and the majority of work is subcontracted to specific trades. These trades as well as consultants and suppliers of materials make up the supply chain of the company. Much of the labour employed is contracted through labour agencies.

## Our Policies

The company operates a number of policies to address the risks facing the company:

- **Supplier policy:** We conduct due diligence on our new suppliers and subcontractors before trading with them. We are now incorporating a request for confirmation from our suppliers and subcontractors that they have policies and reviews in place to ensure they are compliant with the requirements of the Modern Slavery Act 2015.
- Orders placed by the company with subcontractors will now include a clause that the subcontractor is compliant with the Modern Slavery Act 2015 as a condition of trade.
- We will expect all companies in our supply chain to comply with our values and we will neither support nor deal with any business knowingly involved in slavery or human trafficking. In addition, we may terminate the business relationship with any supplier who fails to provide adequate assurances that they have assessed and addressed their own level of risk.
- **Anti-Slavery Policy.** This sets out the company's position on modern slavery and human trafficking and is available to all employees. Staff will receive training on this new policy so they understand the signs of modern slavery and what to do if they suspect it is taking place within our supply chain.
- **Recruitment Policy.** All new employees are subject to checks to verify their eligibility to work in the UK. All new staff receive training as part of the company induction procedure on how to identify the risks of human trafficking and modern slavery.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our Modern slavery and human trafficking statement for the year ended 30<sup>th</sup> June 2018. This policy statement will be reviewed annually and published.

A handwritten signature in black ink, appearing to read "Chris Bartram", with a long horizontal flourish extending to the right.

**Chris Bartram**  
Managing Director

Date: 22<sup>nd</sup> February 2019