

# Modern Slavery Policy

## AC1 CONSTRUCTION

### Anti-slavery and human trafficking Policy

#### 1. Premises and statements

1.1 This Policy is formulated on the premise that all forms of labour abuse that constitute modern slavery, including, but not limited to forced labour, servitude, de facto slavery, and human trafficking stand in violation of fundamental human rights and shall never be tolerated in any form or under any circumstances. To this aim, the Company is committed to maintaining its integrity and ethical approach in all of its business relationships, making it a point to implement effective monitoring and control systems that leave no room for any type of modern slavery in any aspect of its corporate activity.

1.2 This Company Policy is based on the premise that, as per the Modern Slavery Act 2015 and the disclosure obligations contained therein, transparency is a must. Consequently, in all our dealings with contractors, suppliers, or other business partners we insist on the same standards, putting in place prohibitions that ensure no one becomes a victim of forced labour, servitude, slavery, or human trafficking. We expect our suppliers too, in their turn, hold their own suppliers or business partners to the same standards, thus making modern slavery a non-possibility.

1.3 The scope of this Policy includes all the people working for the Company or on behalf of the Company, regardless of their status, including, but not limited to, all types of employees, directors, officers, agency workers, agents, or contractors, as well as business partners, external consultants or third-party representatives.

1.4 The provisions of this Policy are not included in any individual labour contract and the Policy itself may be amended at our discretion.

#### 2. Responsibility for the Policy

2.1 Compliance with the legal and ethical obligations under this Policy is the responsibility of our Directors; as it follows, it is up to them to ensure the lower-ranking employees under their control consistently implement the Policy themselves.

2.2 The person bearing main responsibility for executing this Policy and ensuring its effectiveness on a day-to-day basis, for answering any queries that may arise in relation to this Policy, and for verifying the internal control systems and procedures put in place to this aim, is the Head of Safety & Health, who is tasked, among others, with combating modern slavery in any of its forms.

2.3 Site Managers, as higher-ranking employees, are in turn responsible for ensuring compliance with this Policy in all aspects under their control, which means consistently working with those who report to them to ensure they are aware of the Policy, understand it and apply it correctly; to this aim, Company employees and representatives are given regular and adequate training in all matters regarding the Modern Slavery Policy.

2.4 Any Company employee or representative may come up with comments and suggestions to improve this Policy. Such contributions, regardless of whom they come from, need to be addressed to the Head of Safety & Health.

#### 3. Compliance with the Policy

3.1 All those working for the company or under its control must read this Policy carefully, understand it and commit to implementing it.

3.2 All those working for the company or under its control are directly responsible for preventing, identifying, or reporting any act of modern slavery, in any aspect of the Company's business. Similarly, all such people need to avoid any activity that may directly or indirectly result in a breach of this Policy.

3.3 Should anyone believe or suspect something has happened or may happen in the future that contradicts the provisions of this Policy, any such act must be immediately reported to the manager.

3.4 The Company encourages everyone concerned to come forth with any issues, beliefs or suspicions regarding instances of modern slavery in any aspect of our business – including the supplier tier – as early as possible.

3.5 Should anyone believe or suspect a breach of this Policy may have occurred or may occur in the future, such concerns must be immediately reported to the manager or another higher-ranking employee, as per the Company's Whistle blowing Policy.

3.6 Should anyone feel unsure whether a particular act or the treatment of workers in general, or specific working conditions within any aspect of our business actually constitutes any of the various forms of modern slavery, such concerns must be discussed with the manager or the Head of Safety & Health.

3.7 The Company encourages openness and welcomes anyone expressing their concerns in good faith, even when such concerns turn out to have been mistaken. Therefore, there will never be any penalty for anyone who, in good faith, reports their belief or suspicion that an instance of modern slavery, regardless of its form, may be happening in any aspect of the Company's business.

Penalties, in the form of detrimental treatment, include disciplinary action, dismissal, threats or other unfavourable treatment connected with raising a concern. Should anyone believe they have suffered any such treatment, they need to immediately inform the Head of Safety & Health and, if the issue is not resolved, they need to further report it formally using the Company's Grievance Procedure.

## 4. Communication and awareness of this Policy

4.1 All individuals working for or on behalf of the company need to be aware of this Policy and to understand the threat that modern slavery represents for our company. Consequently, they receive comprehensive training in this respect as part of the induction process, further supplemented with regular training as necessary.

4.2 As the Company is committed to a zero-tolerance approach regarding modern slavery, this Policy is duly communicated to all suppliers and business partners at the outset of our business relationship with them, with further reminders being provided as needed.

## 5. Breaches of this Policy

5.1 Breaches of this Policy by any Company employee will incur disciplinary action, which may result in termination of the Company's relationship with that particular individual on grounds of misconduct or gross misconduct.

5.2 Similarly, the Company may choose to terminate its relationship with any other individuals and organisations working on its behalf as a consequence of them breaching this Policy.



**AC1 Construction Limited**

1 Healthaid House, Marlborough Hill, HA1 1AD

Registration no: 07456903

UTR 8458000331

VAT no: 116766207

Tel: +44(0) 2035568061 / Mobile: +44(0) 7850867779

Website: [www.ac1construction.com](http://www.ac1construction.com)

Claudia Craciun      DIRECTOR      *Claudia Craciun*      DATE: 15-07-2020

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