

# Introduction

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human trafficking policy. The policy sets out the Company's commitment to preventing slavery and human trafficking in the business and the steps we have taken or are in the process of putting in place with the aim of ensuring that there is no slavery or human trafficking in our own operations and supply chains. We all have a duty to be alert to risks, however small. Staff members are expected to report their concerns confidentially and for management to act upon them.

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Policy affirms its intention to act ethically in our business relationships.

### **Organisational Structure**

Heyrod Construction Limited undertakes building and civils works and acts as a principal and specialist contractor which operates within the United Kingdom out of it's Head Office in Oldham. The core activities of the company are reinforced concrete structures including conventional concrete frame and slabs construction together with concrete works to individual prestigious buildings and structures.

### **Supply Chains**

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

Heyrod actively manages its relationships with its suppliers. There are clear contractual agreements in place with all direct suppliers, who are required to sign up to our terms and conditions. Heyrod will continue to communicate the standards expected of its suppliers through a variety of mechanisms including direct buyer interaction, emails to suppliers, via our website and supplier questionnaires. We have zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values.

### **Direct, Temporary and Agency Employment Practices**

Within the business, our recruitment process ensuring right to work checks are carried out, all staff are over the age of 16 and contract of employment are issued. All of our direct employees are paid as an absolute minimum, in accordance with UK legislation and this is kept under regular review.

We expect all agency providers to be able to satisfy us that all staff, have not had to pay for the opportunity to work, are legally able to work within the UK and correct PAYE evaluations are carried out. Within our preferred supplier list we will be taking consideration of the agency's ability to respond to our requests for compliance. We are in the process of contacting all of our temporary agencies and labour providers to make them aware of our intentions.

#### Training

A modern slavery briefing has been given to all relevant Heyrod Personnel. To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company will continue to communicate the policy and highlight how to recognise risks of slavery and human trafficking. This is undertaken by regular briefings and other written communications

Training continues to be delivered to those in roles most likely to be in a position to identify and address potential modern slavery risks including our Human Resources and Purchasing functions.

# Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers and will regularly review its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers; and making clear our expectations of business partners; evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Signed for and on behalf of the Board of Directors Jim Ness - Contracts Director

A.y. New

Date 12th September 2023