

SMS 28 - SLAVERY AND HUMAN TRAFFICKING POLICY

- **INTRODUCTION FROM THE COMPANY DIRECTORS**

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however, small in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Brick Peers Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Brick Peers Ltd has a zero tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

- **OUR BUSINESS**

Brick Peers Ltd is a family owned business based in Wells, Somerset operating throughout the UK. We undertake all types of building works, specialising in subcontract masonry and carpentry.

- **OUR SUPPLY CHAINS**

Our supply chains includes the sourcing of labour to work on our projects and the sourcing of raw materials for undertaking construction processes.

- **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Brick Peers Ltd are 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

- **DUE DILIGENCE FOR PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, we operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Slavery Policy and Human Trafficking Policy.
2. Corporate, Social and Responsibility Policy.
3. Recruitment Policy: - We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Ensuring the minimum wage is paid to personnel in line with current government legislation.
4. Verification of Labour on Site:- Our Supervisors undertake individual personnel checks prior to commencement of work to ensure labour reporting directly to site have the correct paperwork and CSCS card scheme requirements, including photographic identification.
5. External Audit:- The company is audited externally by the CITB Levy Board of its payroll and labour force.
6. Subcontractors:- Approved subcontractor lists are used where internal verification processes are undertaken in accordance with our health & safety policies and procedures and ensuring personnel are registered within the construction industry scheme.
7. Suppliers of construction materials:- The company uses reputable suppliers for the provision of building materials undertaking checks of accreditations and memberships prior to purchasing and procurement.
8. Monitoring:- Monitoring is undertaken regularly by Senior Management of our policies, procedures and processes throughout the company.
9. Whistle blowing and reporting:- We operate a whistle blowing procedure so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. The company's policy on whistle blowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

- **SUPPLIER ADHERANCE TO OUR VALUES**

We have a zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

This policy on modern slavery will be communicated to all suppliers, contractors and business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.

Brick Peers Ltd will conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage in line with current government legislation (UK based suppliers)
4. We may terminate the contract at any time should any instances of modern slavery come to light

- **TRAINING**

Brick Peers Ltd has provided training to employees by briefing them on the company slavery and human trafficking policy and raising the awareness. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

- **OUR PERFORMANCE INDICATORS AND REVIEW**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.



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- **APPROVAL FOR THIS STATEMENT**

This statement was approved by the Board of Directors of Brick Peers Ltd.

Signed:

Position: Managing Director

Date: 1st December 2019