

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the company 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. The Company 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**

We are a UK based privately owned business-to-business landscape service provider. The company has its head office in Windlesham, Surrey and we operate nationally.

### **Our Supply Chains**

Our procurement mainly involves UK based suppliers with the remainder being EU based. These are generally recognised as being at lower risk of Modern Slavery issues.

Over the next 12 months we intend to investigate further the origins of the base materials used for the supply of our uniforms and salt for gritting which we regard as our prime areas of potential risk.

### **Our Policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern slavery and human trafficking policy. This policy sets out the organisation's stance on modern slavery and explains how instances of it can be identified as well as where to go for help.
2. Anti Bribery policy.
3. Company Values. This details our organisational and individual commitment to others and that of our employees.
4. Modern Slavery and Human Trafficking Suppliers Code of Conduct. This code explains the manner in which we expect our suppliers to act in their dealings with us, their employees and their suppliers.
5. Equality policy.
6. Ethical Conduct policy.
7. 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.

8. Whistleblowing policy. We operate a whistleblowing policy 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.

### **Our Suppliers & Sub-contractor partners**

We seek to build lasting relationships with our suppliers and are committed to respecting the rights of workers throughout our business including our product and services supply chains.

We operate a supplier policy and maintain a preferred supplier list.

Our expectations are in accordance with the provisions of the [Ethical Trading Initiative Base Code](#), which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice as follows:

- **Employment is freely chosen** – there is no forced, bonded or involuntary prison labour; workers are not required to lodge “deposits” or their Identity papers with their employer and are free to leave after reasonable notice.
- **Freedom of association** – including the right to form or join trade unions without discrimination
- **Working conditions are safe and hygienic** – in accordance with the prevailing knowledge of the industry and specific hazards. Risk assessments and safe method of working are in place and adequate steps taken to prevent accidents and injury to health at work. Workers must receive regular and recorded Health & Safety training and have access to clean toilet facilities and potable water.
- **Child labour shall not be used**
- **Living wages are paid** and all workers to be provided with written and understandable information relating to their employment conditions, including rate and timing of pay.
- **Working hours are not excessive** – compliant with national laws and regulation.
- **No discrimination is practiced** – in relation to hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- **Regular employment is provided** – to every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- **No harsh or inhumane treatment is allowed** – physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

In addition we seek confirmation from our suppliers and subcontractors 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. (For UK based suppliers) They pay their employees at least the National Living Wage.

4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

### **Training**

We have designed a training session, which will provide information to all of our employees to help them understand what modern slavery is, our business stance to it as well as potential signs of modern slavery. We also cover what they should do if they have reason to believe or suspect that it is taking place anywhere within our supply chain. Our aim is to deliver this session across our entire employee teams and to undertake refresher training at regular intervals.

### **Our performance indicators**

With the application of our internal policies and procedures, we are confident that our direct workforce is free from slavery and human trafficking. The measures that we have in place regarding our supply chain due diligence will over time demonstrate that we are fulfilling our obligations.

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 validated reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified, which we could have identified from our processes and procedures.

### **Responsibility , Implementation and Approval for this statement**

The Company directors and senior management team take responsibility for implementation and approval of the Modern Slavery and Human Trafficking Statement.



Signature:  
Managing Director

Date: 1<sup>st</sup> March 2018