

## ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Industrial Construction (Sussex) Limited, hereafter referred to as ICS, has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, ICS accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications. This policy applies to all individuals working for ICS or on the ICS's behalf in any capacity, including employees, directors, sub-contractors, contractors, and consultants.

### **Breach of the policy**

Non-compliance with this policy by employees may result in disciplinary action, up to and including summary dismissal, and by contractors, agents or third parties working on our behalf, in termination of contract.

### **Actions to report Anti-Slavery & Human Trafficking**

#### Whistleblowing Procedure

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. section of

In summary, team member should approach either their Line Manager, or CEO or the Human Resources. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

Lloyd Thompson  
CEO

Reviewed February 2017