

## Modern Slavery Policy

23.01.2019

### Overview

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain. Whilst Manning Construction Ltd does not fall into the bracket of obligatory reporting, we have developed and implemented this policy in line with our Integrated Management System (IMS).

### What is Modern Slavery?

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

### Our policy

Manning Construction Ltd has a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our own business or supply chain, we will actively report these to the UK authorities.

The values of Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility underpin our culture and how we do business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

### Our procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

- We have robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above.
- We make a commitment to collaborate closely with suppliers to help them understand and work towards their own obligations under the Modern Slavery Act.
- We have transparency in our supply chains through Supplier/Contractor questionnaires, and the reserved right to undertake second party audits.
- We want to help our people to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context. We

## **Manning Construction Ltd Modern Slavery Policy**

will highlight the 'modernslavery.co.uk' site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline.

- We will actively encourage our employees to report suspected of human trafficking and modern slavery.

This Policy alongside all of our high-level policies will be reviewed at least annually to ensure they are continually developed and remain fit for purpose.

Manning Construction Ltd shall take responsibility for this statement and its objectives which will be reviewed and updated as appropriate.

Our policy is available to all persons working on behalf of Manning Construction Ltd and will be made available to interested parties upon request. This Modern Slavery Policy Statement is also available on the Manning Construction Ltd website.



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**Mr. Stephen Euston**  
Managing Director