

Whiting Landscape Limited Health & Safety Management	Document Reference: 26.0	
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ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2018-2019

1. PURPOSE OF THIS POLICY

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Whiting Landscape with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- 1.2 As a Company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 2.2 All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employee’s obligations under their contract of employment.
- 2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:
- (i) Be aware of which parts of the business are potentially most at risk of modern slavery
 - (ii) When dealing with suppliers to be mindful of any indications that modern slavery is evident
- 2.4 Ensure that right to work checks are completed for all employees
- 2.5 Suppliers – we carry out online searches and have discussions with our principal suppliers to ensure that they have taken reasonable steps to combat modern slavery within their business

3. RESPONSIBILITY FOR THE POLICY

- 3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company’s leadership. The Board of Directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

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.

Any of the following should prompt a report to one of the Company’s directors:

- You suspect a person acting on behalf of the company seeking to exploit another in a way which could amount to modern slavery;

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- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of the company who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of the Company or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Indications that modern slavery may exist:

- Severe economic exploitation through coercion
- Lack of human rights framework
- Control of one person over another by threat of violence or removal of documents
- Existence of trafficking and smuggling

5. SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. REVIEW

Following its initial adoption, 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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