



Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which has in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Leaves Building & Maintenance Contractors have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place in our own business or in any of our supply chains.

This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

This policy applies to all persons working for the company or on our behalf in any capacity, including employees at all levels, directors, officers.

Policy Statement

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Leaves Building & Maintenance Contractors is also 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.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

We expect that our suppliers will hold their own suppliers to the same high standards and where they do not that they face appropriate sanctions.

Links to other policies

In addition to this Anti-Slavery and Human Trafficking policy, Leaves Building & Maintenance Contractors operates a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 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.
- Whistle-blowing policy. We operate a whistle-blowing 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.
- Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Responsibility for the policy

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Office Manager, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.



Management are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR the Office Manager or use the Whistleblowing Policy to report as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the company or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Office Manager OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Office Manager.

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.

If you believe that you have suffered any such treatment, you should inform the Office Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's available on the 'S' drive.

New Suppliers and Supplier adherence to our values and ethics

Appointment of new suppliers will take account of:

- Identifiable risks associated with a particular product or geographical area of origin;
- The general reputation of the supplier in terms of slavery and human trafficking risks;
- Drawing the supplier's attention to obligations within the contract with regard to slavery and human trafficking.

Supplier adherence to our values and ethics

As part of our contracting processes, we require our suppliers to comply with this policy and all associated Code of Practice. Any failure by a supplier to meet the standards set out in this policy will be a breach of contract and may result in the termination of our relationship with them.



Leaves Building & Maintenance Contractors will make all its suppliers aware that the Modern Slavery Act 2015 may be a consideration for their business to take measures to prevent slavery and human trafficking.

Training, Communication and awareness of this policy

All suppliers will be monitored, and any concerns discussed through the supplier contract management process.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and additional training will be provided as necessary.

Our zero-tolerance approach to modern slavery should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf.

Signed:

A handwritten signature in black ink, appearing to read "Paul Leaves".

Paul Leaves

Managing Director

October 2021