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Anti-Slavery and Human Trafficking Policy

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 have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The Modern Slavery Act 2015, is supported by Erith Holdings Limited and all its subsidiaries, collectively referred to as the Erith Group. This policy will be reviewed annually to ensure compliance is maintained.

Policy Statement

During 2023/24, we will continue to monitor and record anti-slavery checks for all personnel working within our business at the point of induction, we will also seek to raise awareness through toolbox talks to our workforce on modern slavery.

To date we have engaged with labour supply agencies to assess their anti-slavery controls and ensure they align with both this policy and the Act. We will continue to assess standards via a pre-qualification questionnaire prior to being permitted onto our supply chain. We will also review a sample of the supply chain to ensure that they have an active anti-slavery check in place.

Responsibility for the policy

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

Management is 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 the supply chain.

The group compliance manager will ensure that the required modern slavery compliance is monitored as part of the ongoing business compliance scheme.

Procurement

Have a responsibility to ensure that the Pre-Qualification Questionnaire (PQQ) from suppliers is filled out with the relevant, requested information attached as required and that this information is kept up to date on the supply chain list on Ezone / COINS SCM.

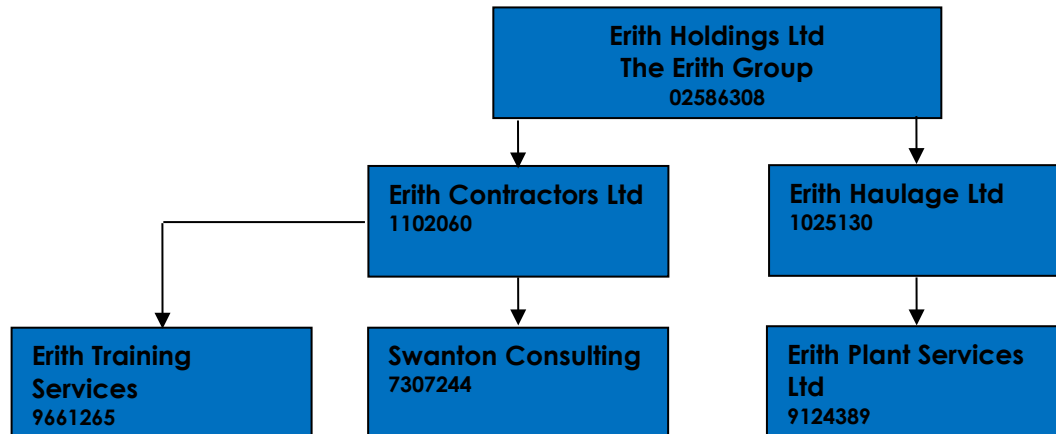
- The Erith Group, and all our subsidiaries, will not tolerate the use of forced or child labour in any of its operations.
- We do not tolerate the physical punishment, abuse, or involuntary servitude of any worker.
- We expect all members of our supply chain to uphold the same standards.
- Should a member of our supply chain be involved in a breach of the Modern Slavery Act, the Erith Group will cease all business activity with that company, effective immediately.
- All those working for or on behalf of Erith will be assessed to a recognised standard before being permitted to work on our behalf.
- We will conduct audits on those working on our behalf to ensure their systems are aligned to this policy and the Act.
- We will not pay individuals through company bank accounts.
- Where required we will provide information to our supply chain to enable them to conform with the Act.

Erith Company Structure

All the companies under Erith Holdings Ltd, as illustrated in the Company Diagram, perform most of their work within the UK and Europe, and our policies apply to each of them without exception.

Amongst them, our Corporate Social Responsibility, Equal Opportunities and Suspected Wrongdoing policies demonstrate the importance of ensuring our employees receive the required duty of care.

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Process for combating trafficking and slavery

We ensure all our staff have provided the required identification documents (as defined in government guidance), prior to their employment and perform the necessary checks to determine their eligibility to work in the UK. All individuals will be required to have their own bank account (on which checks will be completed), we will not authorise payment of individuals through company bank accounts.

Training and Awareness

Erith utilise their own cloud-based intranet system known internally as Ezone. This system is continuously updated and alerts relevant employees when contracts and Working Visas are due to expire. Ezone is also used to share information to all our employees, which means we can distribute awareness bulletins, advice, and guidance on a range of topics, including our stance against forced labour and human trafficking.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction pack for new staff and regular updates will be circulated via toolbox talks and awareness days.

Signed for and on behalf of the Executive Board:



Steven Darsey
Company Chairman
 25/09/2023 (maximum review period 1 year)