



Modern Slavery and Human-Trafficking Statement

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery.

In broad terms:

- 'slavery' is where ownership is exercised over a person;
- 'servitude' involves coercion to oblige a person to provide services;
- 'forced or compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
- 'human trafficking involves arranging or facilitating the travel of a person with a view to exploiting them.

Section 54 of the Act imposes a legal obligation on large commercial organisations to report on transparency in supply chains. This will require the publication of annual slavery and human trafficking statement.

Introduction

This statement sets out "Seven Contractors Ltd" actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

Working within the construction sectors, "Seven Contractors Ltd" recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Risk

"Seven Contractors Ltd" approach to risk management process is outlined in the risk management document. Its primary aim is to safeguard the assets of the company ensure compliance with all statutory and regulatory requirements; and maximise the chances of achieving the corporate objectives.

High-risk activities

We do not believe we have any activities that are considered to be at high risk of slavery or human trafficking.

Responsibility

Responsibility for "Seven Contractors Ltd" anti-slavery initiatives is as follows:

- **Policies:** The Managing Director is responsible for managing and leading the development of new, and review of existing, policies and procedures across "Seven Contractors Ltd". All policies are subject to a sign-off process and include an Equality Impact Assessment. Modern Slavery impacts across a range of policies.
- **Risk assessments:** We state within our risk register that we will comply with all miscellaneous legislation, but will make specific reference to the Modern Slavery Act in the future. Production of our Modern Slavery statement will also mitigate some of our previously recognised risks e.g. "Failure to demonstrate a positive approach to equality and diversity leading to low customer satisfaction."
- **Training:** We have delivered information to all office staff making them aware of Human Trafficking and Anti-slavery.

Relevant policies

"Seven Contractors Ltd" operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing:** We encourage all our staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of "Seven Contractors Ltd". This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing guidance is designed to make it easy for staff to make disclosures, without fear of retaliation.
- **Employee code of conduct:** Our code of conduct makes clear to staff the actions and behaviour expected of them when representing "Seven Contractors Ltd". We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chains.
- **Procurement Strategy/Policy:** Our Procurement Policy and Strategy details the processes we will follow in relation to procuring products and services, ensuring that we



comply with all relevant legislation. It also details how we will seek to add Social Value to the contracts we procure. We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Contractors are required to demonstrate that they provide safe working conditions where necessary, treat staff with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment policy:** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting staff from that agency.

Due diligence

"Seven Contractors Ltd" undertakes due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include:

- The companies due diligence approach to Procurement is clearly outlined in our Procurement policy;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers if needs be and requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

We have reviewed our key performance indicators (KPI's) in light of the introduction of the Modern Slavery Act 2015. As a result, we will introduce and monitor the following KPI's:

- Instances of breaches of Modern Slavery Act = zero;
- Require all staff to complete awareness training on modern slavery by watching Modern Slavery is closer than you think' as part of their induction.

Training

We require all staff to watch the Governments Modern Slavery is closer than you think video, https://www.youtube.com/watch?v=Jv1H_fAoOG4 in order to provide them with an awareness of modern slavery. All staff are also provided with Modern Slavery: A briefing document.



Awareness-raising programme

As well as training staff, we will be raising awareness of modern slavery issues by distributing flyers to staff and circulating a series of emails/notices that explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues;
- what external help is available, for example through the Modern Slavery Helpline.

Signed and Dated:

Seven Contractors Ltd

Director

Eduardas Zarkovas

Date: 07/10/2019