

POLICY

Modern Slavery Policy

Main Author	Reviewer	Reviewer	Approver
Michael Carroll	Liam O'Meara	Michel Mauricio	Tom Barrett Managing Director

REV	Date	Status / Description of Changes
01	05/08/2019	Updating all laws/regulations dates to the current standard. Adjusting template, for a more clear layout.
02	22/07/2020	Updating all laws/regulations dates to the current standard. Adjusting template, for a more clear layout.
03	07/12/2020	Minor adjustment to template
04	01/11/2021	Minor adjustment to template, laws/regulations checked

Contents

1. Introduction	3
2. Our business	3
3. Our high risk areas.....	3
4. Our policies	3
5. Our suppliers.....	4
6. Training.....	4

Introduction

This policy is in compliance with requirements the Modern Slavery Act 2015 and sets out the steps that Gradewell Construction Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Gradewell Construction Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Gradewell Construction Limited is a small business of around 25 employees that undertakes various work on building sites . Our work requires skilled workers to conduct our activities. Our supply chain is limited to equipment required for completing the various works.

Our high risk areas

Gradewell Construction Limited has no high-risk areas related to modern slavery. Personnel are paid well in excess of living and minimum wages. Equipment is limited in scope and sourced from reputable suppliers, predominantly based within the United Kingdom.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organization's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. 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.
3. 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.
4. Other Policies that outline our position on sustainability, financial integrity and industrial relations to ensure that Gradewell Construction Limited employees and their supply chain always act with integrity and to the highest ethical standards.

Our suppliers

Gradewell Construction Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. For UK based suppliers, the supply chain pays their employees at least the national minimum wage / national living wage, as appropriate.
4. For international suppliers, the supply chain pays their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for those who undertake procurement/buying so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Thomas Barrett – Director

