

HR Policies – Modern Slavery

Modern Slavery and Human Trafficking Policy of Construction Industry Solutions Limited (COINS)

1 What is slavery?

1.1 The Modern Slavery Act ("MSA") 2015 covers four activities:

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| Slavery | Exercising powers of ownership over a person |
| Servitude | The obligation to provide services is imposed by the use of coercion |
| Forced or compulsory labour | Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily |
| Human trafficking | Arranging or facilitating the travel of another person with a view to their exploitation |

1.2 This policy covers all four activities.

2 How is it relevant to us?

2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to COINS, but it's not.

2.2 At a very basic level, preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

2.4.3 cleaning and catering suppliers

2.4.4 corporate hospitality

3 Responsibilities

3.1 COINS, its directors and employees have responsibilities to ensure their fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

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3.3 UK businesses required to produce an annual modern slavery statement are being urged to publish this in a new online registry operated by the Home Office.

The Modern Slavery Statement Register is designed to make it easier for consumers and investors to search for statements, and to compare the actions that businesses subject to the requirements are taking to identify and address the risks of modern slavery in their operations and supply chains. Publication in the registry is currently voluntary and COINS signed up to this is 2021.

3.4 COINS shall

3.3.1 make a clear statement that we take our responsibilities to our employees and our clients seriously (see 4.1)

3.3.2 ensure policies and procedures prevent exploitation and human trafficking, and protect our workforce and reputation

3.3.3 be clear about our recruitment policy (see 4.3)

3.3.4 check our supply chains (see 4.2)

3.3.5 lead by example by appropriately monitoring, employees, recruitment agencies, suppliers, etc to ensure we know who is working for us

3.3.6 ensure we have in place an open and transparent grievance process for all staff

3.5 Directors and Managers shall:

3.4.1 listen and be approachable to all staff

3.4.2 respond appropriately if they are told something that might indicate a colleague is in an exploitative situation

3.4.3 remain alert to indicators of slavery (see 5)

3.4.4 use their experience and professional judgment to gauge situations

3.6 Employees

Everybody has responsibilities under this policy. Whatever their role or level of seniority, staff must:

3.5.1 keep your eyes and ears open—if you suspect someone (a colleague or someone in COINS' supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see 6)

3.5.2 follow COINS' reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated

3.5.3 tell us if you think there is more we can do to prevent people from being exploited

4 Our procedures

4.1 Anti-slavery statement

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4.1.1 COINS shall make a clear statement that it takes its responsibilities to its employees, people working within our supply chain and its clients seriously.

4.1.2 COINS shall make this statement on our website:

4.2 Supply chains

4.2.1 COINS thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

4.2.2 Where appropriate, COINS tells the companies that we do business with that we are not prepared to accept any form of exploitation.

4.2.3 From time to time COINS issues various suppliers with a questionnaire to monitor compliance with various obligations including the Modern Slavery Act 2015.

4.3 Recruitment

4.3.1 Using agencies

4.3.1.1 Our HR department follows firm policy and only uses agreed specified reputable recruitment agencies.

4.3.2 General recruitment

4.3.2.1 COINS always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

4.3.2.2 COINS always ensure staff are legally able to work in the UK.

4.3.2.3 COINS check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

4.3.2.4 COINS provide information to all new recruits at induction on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

4.4 If, through COINS recruitment process, it is suspected someone is being exploited, the HR department will follow our reporting procedures (See 6).

5 Identifying

5.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

5.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:

5.2.1 The person is not in possession of their own passport, identification or travel documents.

5.2.2 The person is acting as though they are being instructed or coached by someone else.

5.2.3 They allow others to speak for them when spoken to directly.

5.2.4 They are dropped off and collected from work.

5.2.5 The person is withdrawn or they appear frightened.

5.2.6 The person does not seem to be able to contact friends or family freely.

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5.2.7 The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

5.3 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

5.4 If you have a suspicion, report it.

6 Reporting slavery

6.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

6.2 Otherwise, you should discuss your concerns with your line manager who will decide a course of action and provide any further advice.

6.3 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with a qualified member of staff in the HR Team before taking any further action.