

# Modern Slavery & Human Trafficking Policy

## Introduction

C3 Construction Ltd is committed to driving out acts of modern-day slavery and human trafficking within our supply chain or any part of our business, including subcontractors.

The policies we have in place and this anti-slavery statement, reflect our commitment to:

- Paying people fairly and properly for their work;
- Acting ethically and with integrity in all our business relationships and;
- Enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with supplies of goods and services to the organisation.

## Employees

All employees who join us are subject to checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, and may include criminal and financial checks.

## Suppliers/Sub-Contractors

We operate a supplier/sub-contractor verification process. We make available for all our suppliers/sub-contractors a copy of our anti-slavery statement, request and review a copy of their statement, as well as undertaking a number of due diligence checks on them.

As part of the Company due diligence process into slavery and human trafficking, the supplier/sub-contractor approval process incorporates a review of the controls undertaken by the supplier/sub-contractor.

Imported goods from sources from outside the UK and EU are potentially more at risk from slavery/human trafficking issues. The level of management control required from these sources will be continually monitored.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chain.

## Breaches

All persons are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains.

If anyone believes or suspects a breach of this policy has occurred or that it may occur in the future has a duty to notify a Director.

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/sub-contractors constitutes any of the various forms of modern slavery, raise it with your line manager.

Any employee who breaches this policy may 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 if they breach this policy.

This policy will be reviewed at least annually and revised as necessary to reflect changes to the business activities and any changes in legislation.

**Signed by Managing Director**

  
**Chris McCathie**  
7<sup>th</sup> September 2021