

DOCUMENT – POLICY

Modern Slavery Policy

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(This policy will be reviewed every 2 years, unless any significant changes happen, it will be reviewed earlier.)

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1 Introduction

- 1.1 Hooke Highways is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and clients.
- 1.2 The Company acknowledges its responsibility within the Modern Slavery Act 2015 upholds the spirit and intentions of the Modern Slavery Act 2015.
- 1.3 We will ensure transparency within the Company and suppliers of goods and the larger supply chain and services to the Company through steps which include:
 - Assessing and reducing the risk in the business of modern slavery practices occurring e.g. checking the authenticity of papers proving a right to work in the UK
 - Having robust procurement policies that ensure our supply chain is scrutinised for compliance and consequences of non-compliance are clear and actioned i.e. that commercial relationships with suppliers, contractors and other business partners will not be entered into (or terminated if existing)
 - Providing information to staff on the warning signs that might indicate that modern slavery is taking place
 - Promoting to staff the importance of raising immediately any concerns they may have
 - Protecting staff who are ‘whistle blowers’ in respect of concerns they have about modern slavery

2 Relevant Company Policies

- 2.1 The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:
 - Whistleblowing policy the Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
 - Code of Conduct. The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour.
 - Recruitment Policy. The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
 - The company also abides by our Corporate Social Responsibility policy.

3 Due Diligence

3.1 The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the Company's own staff audit, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans where applicable;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular our Ethical Sourcing initiatives;
- 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.

4 Performance Indicators

4.1 The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- requiring all staff to be aware of modern slavery;
- developing a system for supply chain verification, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply, whereby the Company evaluates all existing suppliers.