

Anti- Slavery and Human Trafficking Policy

**Chisholm & Winch
Contracts (Ltd)**

Organisation's Structure

We are a construction company specialising in commercial and residential projects, with over 43 years in the business.

Our head office is based in Harold Hill, Romford, Essex and we have a satellite office based at Heathrow Airport. We generally work within the M25 and Home Counties.

Our Business

Summary of works Chisholm & Winch carry out:

Airport – Building and Fit-Out on projects with BAA and Airlines customers (2nd Tier Partnering Supplier).

Major Joinery and Toilet Fit-Out projects – Commercial Clients and Trade package works.

Social Housing – Replacement doors, windows and refurbishment.

Refurbishment and New Build, Design & Build and Residential Refurbishment and Fit-Out projects.

Our Supply Chain

Our Supply Chains include:

Labour only sub contracting

Specialist trade sub contractors

Material suppliers

Plant hire suppliers

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers hold similar ethos.

Due Diligence Processes for Slavery And Human Trafficking

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

1. Policy Statement

- 1.1** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2** We are also committed to ensuring there is a transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3** This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, contractors, external consultants, third-party representatives and business partners.
- 1.4** This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility For The Policy

- 2.1** The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2** The Managing Director has primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3. Compliance With The Policy

- 3.1** You must ensure you read, understand and comply with this policy.
- 3.2** The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3** You must notify your manager or the managing director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4** You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or of any supplier at the earliest possible stage.
- 3.5** If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our business, constitutes any of the various forms of modern slavery, raise it with your manager or the managing director.
- 3.7** We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concern. If you believe that you have suffered any such treatment, you should inform the managing director immediately.

4. Communication And Awareness Of This Policy

- 4.1** Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches Of This Policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed:

Simon Castle

Managing Director

Chisholm & Winch Contracts (Ltd)

Date: October 2016