

POL020 Anti-Slavery Policy

Issue	Date	Comments
2	August 2023	Now includes Policy & Statement

Contents

Section	Description	Page
1	Purpose and scope	1
2	What is Slavery?	1
3	How is it relevant to us?	2
4	Responsibilities	2
5	The risks	3
6	Our procedures	3
7	Identifying slavery	5
8	Reporting slavery	5
9	Training	6
10	Monitoring our procedures	6
Appendix 1	Anti-Slavery Statement	7

1. PURPOSE AND SCOPE

'Everlast Group' incorporates Everlast Waterproofing, Everlast Rail, Everlast Specialist Surveys and Everlast Scaffolding and is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

2. WHAT IS SLAVERY?

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

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

POL020 Anti-Slavery Policy

2.2 This policy covers all four activities.

3. HOW IS IT RELEVANT TO US?

3.1 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 us, but it's not.

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

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

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

3.4.1 our supply chain

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

3.4.3 cleaning and catering suppliers

3.4.4 corporate hospitality

3.4.5 labour only sub-contractors

4. RESPONSIBILITIES

4.1 Everlast Group managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

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

4.3 Organisation responsibilities

We will:

4.3.1 maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation

4.3.2 be clear about our recruitment policy

4.3.3 check our supply chains

4.3.4 lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us

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

4.3.6 seek to raise awareness so that our colleagues know what we are doing to promote their welfare

4.3.7 make a clear annual Statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously



POL020 Anti-Slavery Policy

4.4 Manager responsibilities

Managers will:

- 4.4.1 listen and be approachable to colleagues
- 4.4.2 respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation
- 4.4.3 remain alert to indicators of slavery (see Identifying slavery)
- 4.4.4 raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- 4.4.5 use their experience and professional judgement to gauge situations

4.5 Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- 4.5.1 keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- 4.5.2 follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- 4.5.3 tell us if you think there is more we can do to prevent people from being exploited

5. THE RISKS

5.1 The principal areas of risk we face, related to slavery and human trafficking, include:

- 5.1.1 Supply Chains
- 5.1.2 General recruitment
- 5.1.3 **Recruitment through agencies**
- 5.1.4 Sub-contracting

5.2 We manage these risk areas through our procedures set out in this policy and elsewhere.

6. OUR PROCEDURES

6.1 Anti-slavery statement

- 6.1.1 We make a clear annual Statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.
- 6.1.2 We make this statement as part of our company reporting through this policy and add it to the government's online modern slavery statement registry.
- 6.1.3 Our historic statements will remain available **on our website**

POL020 Anti-Slavery Policy

6.2 Supply chains

- 6.2.1 We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- 6.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.
- 6.2.3 All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.
- 6.2.4 We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check. All our suppliers that we engage with must go through our detailed internal PQQ which forms their auditing, risk assessment and mapping.

6.3 Recruitment

6.3.1 Using agencies

- 6.3.1.1 Our HR department follows the company recruitment policy and only uses agreed specified reputable recruitment agencies.
- 6.3.1.2 To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - 6.3.1.2.1 conducting background checks
 - 6.3.1.2.2 investigating reputation
 - 6.3.1.2.3 ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas)
 - 6.3.1.2.4 ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- 6.3.1.3 We keep agents on the list under regular review, at least every 2 years.

6.3.2 General recruitment

- 6.3.2.1 We 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.
- 6.3.2.2 We always ensure staff are legally able to work in the UK.
- 6.3.2.3 We 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).
- 6.3.2.4 We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.



POL020 Anti-Slavery Policy

6.4 If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (see Reporting slavery).

7. IDENTIFYING SLAVERY

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

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

7.2.1 the person is not in possession of their own passport, identification or travel documents;

7.2.2 the person is acting as though they are being instructed or coached by someone else;

7.2.3 they allow others to speak for them when spoken to directly;

7.2.4 they are dropped off at and collected from work;

7.2.5 the person is withdrawn or they appear frightened;

7.2.6 the person does not seem to be able to contact friends or family freely;

7.2.7 the person has limited social interaction or contact with people outside their immediate environment.

7.3 This list is not exhaustive.

7.4 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.

7.5 If you have a suspicion, report it.

8. REPORTING SLAVERY

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

8.2 If you think that someone is in immediate danger, dial 999.

8.3 Otherwise, you should discuss your concerns with the **HR Manager** who will decide a course of action and provide any further advice.

8.4 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 the **HR Manager** before taking any further action.

9. TRAINING

9.1 We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

9.2 More general awareness training is provided to all staff through the Supply Chain School online training and via supervisors and managers in formal training sessions.



POL020 Anti-Slavery Policy

10. MONITORING OUR PROCEDURES

- 10.1 We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

POL020 Anti-Slavery Policy

Appendix 1

This is the historical Anti-Slavery Statement from prior to 2023.

Anti-Slavery Statement

Although my company does not fall under the requirements of the Modern Slavery Act 2015 (Turnover less than £36 Million) I am committed to ensuring acts of modern-day slavery and human trafficking will never be an issue within my company and its supply chain, including sub-contractors, and partners.

I will ensure that there is full transparency within my company and our suppliers of goods and services to the organisation with a commitment to:

- Legal compliance, ethical standards and fundamental human rights as set out by the principles of the ILO/UN Guiding Principles
- Raising awareness of modern slavery issues including how to spot the signs in the business and supply chain
- Provide whistleblowing and/or other mechanisms for reporting issues
- Nominated a person at the most senior management level within the business that has responsibility for the prevention modern slavery within the business
- Address and directly prohibit practices that are known to contribute to the risk of modern slavery
- Due diligence requirements for the business and supply chain and the steps it will take should modern slavery practices be identified within either
- Identification of and management of any high-risk materials/labour sourcing

Furthermore:

As part of my company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier whenever the Supplier falls under the requirements of the Modern Slavery Act.

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

I will not permit my company to support or deal with any business knowingly involved in slavery or human trafficking. The nominated person shall take responsibility for implementing this policy statement and its commitments and shall provide when adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

A copy of this policy will be made available and communicated to and understood by all our Employees and where necessary our External Providers with a copy of the Modern Slavery Act 2015 held within the Legislation Register and available to all employees upon request.

Formal procedures concerning slavery and human trafficking will be established, when required including disciplinary procedures where the requirements of the Act have been identified as being breached.

Mike Hunter

Managing Director

Everlast Group August 2022