

## **EWG-HR-P-024 - MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

Eric Wright Group Ltd and all subsidiary companies

**June 2024**

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# EWG-HR-P-024 – Modern Slavery & Human Trafficking Policy

## 1 What is slavery?

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

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

1.2 This policy covers all four activities.

1.3 This policy covers the Eric Wright Group and its subsidiary companies including Eric Wright Construction Limited, Eric Wright Civil Engineering Limited, Eric Wright FM Limited, Eric Wright Water Limited, Eric Wright Partnerships Limited, Maple Grove Development Limited and Applethwaite Limited.

## 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.

2.2 With this in mind, we pay particularly close attention to our supply chain and agency workers.

## 3 Responsibilities

3.1 Eric Wright Group and all its divisions, have responsibilities to ensure our employees and those supplying goods and services to us are safeguarded, treated fairly and with dignity and therefore we require our employees and associates and suppliers to observe this policy and be aware that turning a blind eye is not an option.

3.1.1 We will:

- (a) maintain clear policies and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation
- (b) check our supply chains through our pre-qualification and audit process
- (c) lead by example by making appropriate checks on employees, recruitment agencies, sub-contractors and suppliers
- (d) ensure we have in place an open and transparent grievance and whistleblowing process
- (e) seek to raise awareness so that our employees, subcontractors, suppliers, and associates know what we are doing to promote their welfare and the welfare of others

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3.1.2 Senior Managers and Directors will:

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

## 4 The risks

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

4.1.1 our supply chains

4.1.2 recruitment through agencies

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

## 5 Our procedures

### 5.1 Modern Slavery and Human Trafficking statement

5.1.1 We make a clear annual statement setting out the steps we have taken to prevent or avoid slavery and human trafficking 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.

5.1.2 We make this statement on our website

### 5.2 Supply chains

5.2.1 We check our supply chains through pre-qualification and monitoring to provide that the potential for slavery and human trafficking is significantly reduced.

5.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.

5.2.3 Our supplier contracts contain an anti-slavery clause. This clause, which flows down through our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

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## 5.3 Recruitment

### 5.3.1 Using agencies

- (a) We will only use reputable recruitment agencies
- (b) To ensure the potential for slavery and human trafficking is reduced as far as possible, they complete pre-qualification before being added to the approved list
- (c) We keep agents on the list under regular review

### 5.3.2 General recruitment

- (a) We provide to all employees a written contract of employment
- (b) We ensure employees are legally able to work in the UK
- (c) 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

5.4 If, through our recruitment process, we suspect someone is being exploited, we will follow our reporting procedures

## 6 Identifying slavery

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

6.2 However, the following signs could indicate that someone may be in slavery or trafficking victim:

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

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

6.2.3 They allow others to speak for them when spoken to directly

6.2.4 They are dropped off and collected from work

6.2.5 The person is withdrawn or they appear frightened

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

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

6.3 There may be other reasons for such behaviour but if we have a suspicion, we will report it.

## 7 Reporting slavery

7.1 We encourage our employees and associates to report their concerns to their line manager or the Group Head of People or any director to stop someone from being exploited or abused. That person will decide on a course of action in conjunction with colleagues and provide any further advice.

7.2 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, great care is taken in the reporting process.



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## 8 Training

- 8.1 We provide training to those employees who are involved in managing recruitment and our supply chains.
- 8.2 More general awareness training is provided to all employees

## 9 Monitoring our procedures

- 9.1 We will review our Modern Slavery and Human Trafficking policy annually and we will provide information and/or training on any changes we make.

<b>Jeremy Hartley</b> <b>Chief Executive</b> <b>Officer</b> <b>Eric Wright Group</b>	Signed.....   Date: 26th June 2024	 <b>ERIC WRIGHT</b> GROUP
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