

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Charles Edward Limited are committed to ensuring that there is no modern slavery, human trafficking or coercion of persons in our Company, in associated companies, subcontractors or labour only service providers. This policy reflects our Company commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our, or any related Company.

Due Diligence – Potential areas of risk

Directly employed persons: Charles Edward have a very small base of directly employed persons, and we never source our personnel from an agency, instead operating a direct interview process resulting in direct contracts, thus negating any possibility that a person would not receive full remuneration for their work.

We never seek to employ persons directly outside of the UK for our UK operations and require appropriate passports, permits to work and leave to stay in the UK prior to a person commencing work, thus negating any possible trafficking issues.

Labour only contractors: Charles Edward Limited extensively employ labour only subcontractors to provide operatives and machine operatives on our sites. To mitigate the opportunity of trafficking, slavery or coercion we require confirmation that a subcontractor employs their own policy such as this prior to their employment by Charles Edward Limited, which is achieved by means of a subcontractor questionnaire process.

Bona Fide contractors: Charles Edward Limited extensively employ bona fide contractors to provide specific and professional trades on our sites. To mitigate the opportunity of trafficking, slavery or coercion we require confirmation that a contractor employs their own policy such as this prior to their employment by Charles Edward Limited, which is achieved by means of a subcontractor questionnaire process.

Suppliers: Charles Edward Limited utilize many suppliers in our projects and are unable to monitor the policies of all of them. We do however hold all suppliers to their legal requirements under the law and will report any circumstances we believe to be improper.

Adherence to this policy

If it is found that any person, company or agency associated with the Company is not abiding by the Slavery and Human Trafficking law then this will be reported to the appropriate authorities, and such person, company or agency will be suspended from use by the Company. In the case of an employee, disciplinary proceedings may result in Gross Negligence charges being brought, which would result in dismissal with prejudice.

Training

The Company commits to providing training to all operative personnel within our remit by way of continuous professional development training regarding slavery and human trafficking.

Policy approval and review

This policy has been approved by Roger Synnuck, Construction Director on 3rd January 2019

A handwritten signature in black ink, appearing to read 'R. G. Synnuck', written over a horizontal line.

Policy review date: January 2020