

MODERN DAY SLAVERY – HINDLEY LAWRENCE POLICY

The scope of this policy applies to HINDLEY LAWRENCE and its Employees.

The Policy covers Modern Day Slavery and Human Trafficking in accordance with the Modern Day Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Modern Day Slavery and Human Trafficking can take on many forms such as; slavery, servitude, forced labour, compulsory labour and human trafficking. This may manifest itself practically in instances of restricted freedom of movement or decision making by individuals, the provision of shared accommodations and central payment for services to a single person (for paying individuals later).

Such activities are an affront to human dignity, an offence in UK law and completely contrary to the values of the HINDLEY LAWRENCE.

HINDLEY LAWRENCE is committed to complying with its obligations under the Modern Day Slavery Act and other relevant legislation relating to the detection and prevention of modern slavery. In particular, HINDLEY LAWRENCE is committed to implementing and enforcing effective systems and controls that seek to ensure that modern slavery is not taking place anywhere in its business or in its supply chains.

Policy

The Company has zero tolerance to breaches in the Modern Day Slavery Act and has in place policies, processes, whistleblowing and auditing procedures to ensure that any organisation within the scope of the policy who transacts business with HINDLEY LAWRENCE complies with it.

The Company expects that any organisation within the scope of the legislation will also apply the same high standards.

Compliance

The company will maintain its compliance with the policy as follows: -

1. Maintaining and updating HR policies in line with legislation and best practice.
2. Following our HINDLEY LAWRENCE recruitment policies.
3. Recruiting as a minimum to the National Minimum Wage level and employees achieving the National Living Wage within 12 month of joining the company.
4. Tracking, monitoring and preventing the risk of occurrence through diligent management.
5. Audit where applicable.

6. Investigating thoroughly any issues/concerns detected.
7. Apply sanctions against those supplier organisations who do not conform to legal requirements.
8. Communicating with employees.
9. Provide appropriate / relevant training and guidance to employees.
10. Provision of confidential 'Whistleblowing' service.

Procedure

Our recruitment processes are transparent with appointments approved by Directors. There are robust procedures in place for the vetting of new employees that enables us to confirm their identities and ensure they are both paid directly and correctly.

All departments entering into a business relationship with a client or business partner are to at the outset of our business relationship with them provide them with a copy of this policy. Where a potential client is able to demonstrate compliance with the Modern Day Slavery Act 2015 via a statement on their website we should attach a copy of their statement to our new account form.

Implementation

HINDLEY LAWRENCE will be responsible for implementing this policy and ensuring that all colleagues are aware of the policy by making it available to view on the company intranet(s).

Managers and their teams will be responsible for ensuring that HINDLEY LAWRENCE has on record for suppliers within the scope of the policy a signed HINDLEY LAWRENCE declaration of compliance.

Responsibility for the Policy

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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting on modern slavery in any part of the Company's business is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

The company will introduce appropriate arrangements to monitor the application of and use of this Policy, dealing with any queries about the policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Communication and Awareness of this Policy

The Board of Directors will communicate the Policy in accordance with statutory legislation.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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.

Reporting of breaches

If you believe or suspect a breach or conflict with this policy has occurred or may occur, you must notify your line manager. These breaches (suspected or actual) are to be passed to head Office (HINDLEY LAWRENCE) so that they can be reported to the national authorities (as required by the National Referral Mechanism (NRM)).

You must raise concerns about any issue or suspicion of Modern Day Slavery in any part of the Company's business as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or alternatively by use of the confidential hotline service.

HINDLEY LAWRENCE will support anyone who raises a genuine concern in good faith under this policy. The company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the business or in any of its supply chain.

Breaches of the Policy

Any breach of our Modern Day Slavery policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

The company will terminate any commercial relationship with suppliers if they are in breach of our policy and/or are found to have been involved in modern slavery.

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