

# Slavery and Human Trafficking Policy Statement



## **Policy Statement**

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners. It sets out the steps PDR Construction Limited will take to ensure that slavery and human trafficking is not taking place in any of its business activities and supply chain partners.

## **Introduction**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all our business dealings and relationships and likewise expects our people, suppliers and sub-contractors to adopt the same approach.

## **Organisational Structure and Supply Chains**

PDR Construction Limited undertakes building, construction projects throughout the UK. We operate across a number of broad sectors, including hotel and leisure, retail and commercial, industrial, health and education, motor retail and residential.

The Company's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

## **Responsibility for the policy**

It is the responsibility of ALL PDR personnel, particularly individuals focussed on our estimating/procurement and those in operational site teams, to maintain PDR's duties in respect of the Modern Slavery Act 2015. Directors and Senior Managers hold special responsibilities to hear, support and investigate allegations by those raising concerns in compliance with the Act and our related Whistleblowing Policy.

The Board of Directors has overall accountability for ensuring that this policy complies with the Company's legal and ethical obligations.

## **Due Diligence Processes**

In order to ensure prevention of slavery or human trafficking taking place within its supply chain, PDR Limited shall:

- Publish the Policy on PDR's website
- Incorporate the Policy into its Pre-Qualifying Questionnaire (PQQ) for suppliers, sub-contractors and partners
- Include an acceptance condition in PDR's Limited supplier Pre-Subcontract Appraisal document to demonstrate that suppliers must abide to the Policy
- Engage our Safety, Health, Environment and Quality (SHEQ) team to undertake ad hoc audits on site to speak directly to workers to detect if any exploitation is taking place e.g. excessive working hours, working for less than the National Minimum Wage (NMW) and/or unsafe conditions exist.
- Conduct reviews of Agency Labour Suppliers to ensure compliance via the Human Resources Team/Senior Buyer. Where non-compliances are found, PDR will invoke sanctions, which may include working with those suppliers to become fully compliant or remove from our Preferred Supplier List.

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## **Risk Assessment and Compliance**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains 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.

We encourage anyone who has a genuine concern to report it to their Line Manager or the Human Resources Manager, who in turn are required to act and ensure that no one suffers 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 its business or in any of its supply chains.

You must raise any concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains immediately. If you are unsure about whether an 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 Human Resources Manager.

You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

## **Training and communication for staff**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases. Additionally, we will ensure: -

- Visibility of the Policy accessed via our Intranet.
- Communicate to staff to read the Statement and Policy and confirm understanding.
- New employees to become familiarised with the Slavery and Human Trafficking Policy as part of their induction process.

## **Breach of the policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate without financial penalty its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

## **Measuring Effectiveness**

This policy will be reviewed annually by the Directors who take responsibility for its implementation to ensure that PDR and our Supply Chain are free of slavery and human trafficking.

Additionally, as part of our continuous improvement strategy, we will continue to strive to improve upon our systems and processes to demonstrate that we operate our business ethically, responsibly and sustainably.

*Paul Dransfield*

**Managing Director**