



Anti Slavery & Human Trafficking Policy

Policy Statement

This policy applies to all persons working for us or in our supply chain or on any capacity on our behalf, including employees, at all levels, company director or contractors.

Town & Country Aggregates strictly prohibits the use of modern slavery and human trafficking in our operation and our supplier chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery will not be taking place anywhere within our organisation or in any of our supply chain. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

At Town & Country Aggregates we shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- Maintain clear policies and procedures preventing exploitation and human trafficking.
- Examine our supply chains and be clear with key suppliers our expectations regarding the Modern Slavery Act 2015.
- Lead by example by making appropriate checks on all employees, recruitment, suppliers etc to ensure we know who is working for us.
- Ensure we have in place an open and transparent whistleblowing process for all staff (see public interest disclosure policy)
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- Make a clear statement that we take our responsibilities to our employees and our clients seriously (see above policy statement)

Procedures

Supply Chains

We tell the companies we do business with that we are not prepared to accept any form of exploitation. We apply reasonable due diligence to risk assessing our supply chain. If any issues are identified then this will be escalated to the correct authorities (detailed below) and procedures to all methods of remediation.

Recruitment

We always ensure staff have a written contract of employment, and the staff are legally able to work in the work the UK. 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. If through our recruitment process, we suspect someone is being exploited then this will be escalated to the correct authorities (detailed below) and procedures to all methods of remediation.

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

The person is not in possession of their own passport, identification or travel documents. The person is acting as if they are being instructed or coached by someone else. They allow others to speak to them when spoken to directly. They are dropped off and collected from work. The person is withdrawn or they appear frightened. The person does not seem to be able to contact friends or family freely. The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Reporting Slavery

At Town & Country Aggregates if we think somebody is in immediate danger we will call 999, in other circumstances we may call 101 to speak to the relevant authorities.

Other numbers we can reach out to are:

Modern Day Slavery Foundation helpline - 0800 0121 700

Salvation Army 24 hour helpline - 0800 818 3733

Remediation

At Town & Country Aggregates we will ensure that if a person is found to be a working slave or trafficked here illegally within the business or supply chain, we will take immediate action to ensure the person is removed from the illegal situation they are in and made safe.

We will seek help and advice from recognised organisations.

We will put in an action plan for the person/persons involved with the appropriate authorities.

This policy is consistent with the obligations under the Modern Slavery Act 2015.