

# Modern Slavery Policy

Rev 1

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Managing Director - Kevin Hague



## **1. POLICY STATEMENT**

**1.1 This policy applies to all companies within Aarsleff Ground Engineering Ltd UK and Avoncross Ltd, including companies trading as Centrum Pile and Cannon Piling (referred to in this statement as 'The Company')**

1.2 This policy is non-contractual and the Company reserves the right to amend or withdraw the policy at any time at the Company's discretion.

1.3 The aims of this policy are:

1.3.2 To provide details of the measures the Company is taking to identify and mitigate the risks to modern slavery

1.3.3 To provide employees with guidance on what the term 'Modern Slavery' means and how to raise any concerns in relation to Modern Slavery.

1.3.4 To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.4 This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. PERSONNEL RESPONSIBLE FOR THE POLICY**

2.1 The Board of Directors have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The Management Board have day-to-day operational responsibility for this policy and must ensure that all line managers and other employees receive regular and appropriate training.

2.3 The Board of Directors, in conjunction with the Head of Human Resources should review this policy from a legal and operational perspective once a year.

2.4 All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected instances of Modern Slavery as well as ensuring they keep up to date with any relevant training modules.

## **3. WHAT IS MODERN SLAVERY?**

3.1 The Company considers that modern slavery encompasses:

3.1.1 Human trafficking;

3.1.2 Forced work, through mental or physical threat;

3.1.3 Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;

3.1.4 Being dehumanised, treated as a commodity or being bought or sold as property;

3.1.5 Being physically constrained or to have restriction placed on freedom of movement.

3.2 We have an important role to play in addressing the risk of modern slavery within our Supply Chain and have set ourselves clear goals to continue to strengthen our approach and ability to do this. Our goals are constantly under review to ensure that the Company has the most up to date information to combat modern slavery.

3.3 If you are uncertain whether something is within the scope of this policy you should seek advice from a Director or the HR department.

#### **4. ORGANISATIONAL STRUCTURE (OUR STRUCTURE)**

4.1 The Company supply chain consists of a variety of vendors of various construction, manufacturing and office related products and services and professional consultants associated with the delivery of our Ground Engineering solutions, products and services to our UK based companies

4.2 The Company procurement activity generally takes place all year round across the UK and our contractors and suppliers are generally based in the UK and Europe.

#### **5. ASSESSMENT OF OUR SUPPLY CHAIN (OUR GOVERNANCE)**

5.1 The Company supplier approval process has steps in place to assess as to whether or not they have a Modern Slavery policy as an absolute minimum, along with any other relevant policies such as Anti-corruption, Fraud and Bribery and Equality Diversity & Inclusion.

5.2 The Company is a gold member of the Supply Chain Sustainability School (SCSS), platinum certified with ConstructionOnline and Triple ISO Certified.

5.3 This year, 2024, The Company intends to actively encourage our suppliers to become members of the SCSS as part of our responsible purchasing practices.

5.4 The Company will also take on board and act upon any recommendations highlighted by the MSAT report ensuring these are also weaved into the goals for the coming year.

5.5 We recognise that more detailed checks are required on high-risk sectors such as products & services from countries with low levels of regulation, where vulnerable workers might be present and where trade unions do not operate and intend to establish a mechanism in order to carry out such checks where they may be relevant.

## **6. TRAINING**

6.1 All employees must complete the mandatory compliance training in relation to Modern Slavery, Anti-corruption, Fraud and Bribery

6.2 All employees are actively encouraged to participate with the modern slavery training suite accessible via the Supply Chain Sustainability School

6.3 The Companies partnership with the SCSS provides our employees with access to specific modern slavery training and a suite of wider resources.

## **7. OUR POLICIES**

7.1 We have several Company-wide policies in place that are relevant to modern slavery, all of which are signed off at Director level. We continually review and develop our policies with input from in-house experts, suppliers and external stakeholders.

7.2 The Company is committed to ensuring policies are communicated to all relevant parties and implemented effectively across our day to day working practices.

7.3 Through our policies we endeavour to ensure that there is no Modern Slavery and Human Trafficking in any part of our business or supply chain

7.4 In addition to rolling out our new up to date Modern Slavery Policy in 2024, we also have the below relevant policies in place:

7.4.1 Modern Slavery Statement

7.4.2 Equality, Inclusion, Diversity policy

7.4.3 Grievance Policy

7.4.4 Refusal to Work Policy

7.4.5 Whistleblowing Policy

7.4.6 Sustainability Policy

7.4.7 Corporate Social Responsibility Policy

## **8. RISK ASSESSMENT & MANAGEMENT**

8.1 The Company currently categorises our supply chain partners and plan to carry out further assessments during 2024 in order to identify potential risks of modern slavery and human trafficking. We will then address any risks identified.

8.2 We will measure our successes and any complaints and record where any instances of modern slavery are identified and how these were addressed.

8.3 We recognise that more detailed checks are required on high-risk sectors such as products & services from countries with low levels of regulation where vulnerable workers might be present and where trade unions do not operate and intend to establish a mechanism in order to carry out such checks where they may be relevant.

## **9. RAISING A CONCERN RELATED TO MODERN SLAVERY**

9.1 We hope that in most cases concerns can be raised with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Management Board.

9.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should raise your concerns via [HR@aarsleff.co.uk](mailto:HR@aarsleff.co.uk).

9.3 Please also refer to one of the above policies listed in Point 7 to support you in raising the issue if needed.

## **10. CONFIDENTIALITY**

10.1 We hope that employees will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

10.2 We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should seek advice from the HR department and appropriate measures can then be taken to preserve confidentiality.

10.3 If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

## **11. INVESTIGATION AND OUTCOME**

11.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

11.2 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

11.3 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to our disciplinary policy.

## **12. EXTERNAL DISCLOSURES**

12.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any instances of Modern Slavery in the workplace and Supply Chain. In most cases you should not find it necessary to alert anyone externally.

12.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy. If you feel that an individual is in danger, please contact the police.

12.3 Modern Slavery concerns may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. We encourage you to report such concerns so they can be investigated. You should contact your line manager or one of the HR Team for guidance.