



Anti-Slavery & Human Trafficking Policy

Policy Statement

This policy applies to all persons working for Sunter Limited or on our behalf in any capacity, including employees at all levels, including: Directors, Managers, Agency Workers, Volunteers, Contractors, Suppliers and Manufacturers.

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

Legal Obligations

This Policy / Statement is made pursuant to S4 Modern Slavery Act 2015 and is Sunter Limited's Human Trafficking / Anti-Slavery Statement.

This Statement will be revised at least annually to ensure current compliance.

Responsibilities

It will be the responsibility of all who work for Sunter Limited as well as any contracted company/person to take on the responsibility and vigilance required to implement the requirements of this Policy.

Sunter Limited Directors will ensure that adequate resources are in place to facilitate any requirement of the Policy.

Sunter Limited Senior Managers will liaise with Directors to implement the Policy.

Site Managers will take daily control of the implementation, vigilance on site and ensuring any concerns/reports are passed to Senior Management

Employees/contractors have the responsibility to report any issues that may be of concern to Site Managers

Reporting Routes

Any person who wishes to report an issue of concern can do-so by:

- Speaking directly to the Site Manager
- Speaking directly to Senior Managers and/or Directors
- Call Sunter freephone 0800 085 6657 and report anonymously (if required)
- Call the Police on 101

Commitments

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.

Commitments

Sunter Limited are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- **Tolerance:** Sunter Limited has a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- **Reporting:** The prevention, detection and reporting of modern slavery in any part of our

organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

- **Engagement:** We are committed to engaging with our employees, contractors, customers, clients, suppliers and manufacturers to address the risk of modern slavery in our operations and supply chain.
- **Review:** We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- **Communication:** Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- **Risk Review:** Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- **Breaches & Control Measures:** If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationship.
- Sunter Limited will uphold all the requirements of the legal aspects of the Modern Slavery Act 2015 and will pass on any information to Clients and the Police. We will also co-operate with any external investigation made by relevant authorities.

Monitoring Compliance

Site Managers have lead responsibility for ensuring compliance with this Policy at site level and will review its effectiveness on a regular basis. They will be responsible for monitoring and will provide regular reports in this regard to the Health & Safety Manager. He will then communicate any findings to Company Directors who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

Training


The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to human trafficking and slavery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

Policy Date: March 2023

Review Date: March 2024

Policy Written by:


Name: John Walker

Signature: 

Position: Health, Safety & Environment Manager

Policy Reviewed by:

Name: Kevin Stubbs

Signature: 

Position: Company Director