



Tom George Surfacing Ltd

Directors: Thomas Penfold & George Das-Friend

Date: 24th May 2024

Next Review Date: 23rd May 2025

T. Penfold

G. Friend

Modern Day Slavery / Human Trafficking Policy and Checking Illegal Working / Right to Work in UK

This Policy has been drafted with reference to National Highways Sector Scheme 16 (NHSS 16) and our processes and activities are aligned and reviewed against this Scheme.

This Policy will be brought to the attention of all through induction.

We are committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up our supply chain.

We identify foreign workers and their nationalities by ensuring passport checks are carried out at induction and prior to any individual working for us. Our Quality Management System and external consultants assist us to comply and document the controls to demonstrate compliance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. These controls are implemented and in place for all current and potential employees?

Our external compliance consultants, AA Safety Solutions Ltd (www.aasafetysolutions.co.uk) assist us to ensure that documents used to verify right to work are compliant with the Home Office Guidance Comprehensive Guidance for Employers on Preventing Illegal Working and are retained for at least 2 years after the individual has left the employer. This also forms part of our archiving and Quality Management System (document control).

This Policy and above controls apply to all agency, self-employed and subcontracted personnel to ensure we have checked and been satisfied they are eligible to work in the UK.

As part of our Quality Management System there is a mechanism for periodic review of right to work of all workers including agency temporary and seasonal employees and this is applied annually.

In addition to assistance from external consultants we utilise guidance and information for compliance from the following source;

<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

As part of our due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001;2015 The implementation and operation of this management system underlines our commitment to this policy.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.