

MORDERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

INTRODUCTION

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We are committed to raising awareness of modern slavery issues including how to spot the signs in the business and supply chain. Staff and Employees are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

Richmond Civil Engineering Limited is a civil engineering and construction company which supplies its services using skilled and certificated operatives, foremen, supervisors, agents and managers to deliver its services and products within the Railway, Civil Engineering and Construction Industries. Richmond Civil Engineering Limited has its head office in the UK and all our business and trading outlets are in the UK.

OUR BUSINESS

Our business is mainly the supply and provision of civil engineering and construction works to civil engineering, construction and railway companies, using our own employees and members of staff.

OUR SUPPLY CHAINS

Our supply chain includes the suppliers of civil engineering and construction materials, plant, tools, plant and tools hire, waste subcontractors, plant and vehicle maintenance services, etc. Our supplier assessment process, led by myself as the Commercial Director, shall include the identification of a potential and high-risk sourcing, and, I will use my commercial training background and skills, to disqualify such suppliers from doing business with our Company.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Richmond Civil Engineering Limited is committed to legal compliance, ethical standards and fundamental human rights as set out by the principles of the ILO/UN Guiding Principles, thus ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We are committed to addressing and directly prohibiting practices that are known to contribute to the risk of modern slavery.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk -

- In all cases, we carry out our services and deliver our works to ensure optimum control of the work environment;
- We limit the geographical scope of the delivery of our services to ensure optimum supervision of our work sites, practices and ethics;
- Where possible and practicable, we use locally-based / regional suppliers and build long-standing relationships with those suppliers as well as with our clients, and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable modern slavery and human trafficking policies and processes. We expect each entity in our business chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the business chain, ultimately to the field or utility generator.

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- We have in place provisions and systems for whistleblowing and other mechanisms to encourage the reporting of issues and concerns, and, to protect the whistle blowers.
- We shall investigate all reported or suspected cases of modern slavery within the business and our supply chain, and, any substantiated cases shall be passed on to the law enforcement agencies for investigation and possible prosecution. We shall also immediately cease and sever any business relationship with the accused party, until proven innocent.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

I am, in my position as the Commercial Director, responsible for compliance throughout the Company and for our supplier relationships, and hence, responsible for preventing modern slavery within the business.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, this policy statement shall be communicated to all staff and employees at initial induction and following policy changes. We shall provide training to relevant managers, agents, members of staff and employees. All Managers, Agents and Members of Staff shall be briefed on the subject. This policy statement shall also be communicated to our suppliers (as necessary) and other interested parties.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits on our Supply Chain by our SHEQ Manager;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's anti-slavery and human trafficking statement for the current financial year. The statement shall be reviewed regularly (annually as a minimum).

This Policy applies, and, shall be communicated to all employees on initial induction and following policy changes, communicated to our subcontractors, suppliers and other interested parties and be reviewed regularly (annually as a minimum) by me (using either the annual management review or other review platform as suitable and appropriate. Where necessary, the Policy shall be revised following the review



Richard Moffit – Commercial Director

Date: 07/09/2020