

AC Hulme & Sons' Modern Slavery Statement

POLICY STATEMENT

AC Hulme & Sons commits to developing and adopting a proactive approach to tackling hidden labour exploitation also known as Modern Slavery.

Hidden labour exploitation is the exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive themselves as such, reluctant to come forward.

Coverage

This policy applies to the following sites - Hoaden Court, Brook Farm & Merton Farm.

Responsibility

AC Hulme & Sons is responsible for the overall aspects of this Policy and Tom Hulme, Kate Barker, Tracy Briggs and Paul Hamlyn have individual responsibility for ensuring implementation of this Policy and making sure that all employees are made aware of the content.

Policy Commitments

AC Hulme & Sons has / will:

1. Arranged for an appropriate manager (*Tom Hulme - Director*) to attend "Tackling Hidden Labour Exploitation" training. Tom Hulme has responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. AC Hulme & Sons will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look out for and have signed appropriate Compliance Principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.

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5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our workforce through posters, worker leaflets, induction and training.
7. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately. We have a whistle blowing policy P1.13.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities (through regular meetings and one to one support).
9. Before employment commences we carry out due diligence by all prospective employees completing a Forced Labour verification test which is in multi languages.
10. We carry out internal staff questionnaires which would give employees the chance to highlight any concerns.
11. We carry out internal Ethical interviews and audits.
12. We participate in external Ethical audits and are SMETA certified. We are also members of Sedex and ETI Base Code compliant.

It is our policy to require labour providers and other organisations in the labour supply chain connected to the Company to adopt policies and procedures consistent with the above.

Date.....

Signed.....

TE Hulme (Director)

Reviewed dates:

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