

# WEIDMANN

## **MODERN SLAVERY and CHILD LABOUR POLICY.**

### **POLICY STATEMENT:**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Weidmann Whiteley Limited has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

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

### **Responsibility for the policy:**

The General Manager has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Human Resources Lead has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The HSEQ Compliance Manager has responsibility for ensuring this policy is reviewed at least annually.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and receive adequate and regular training on it and the issue of modern slavery in supply chains.

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## **Compliance with the policy:**

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their line manager or Human Resources Lead as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If employees believe or suspect a breach of this policy has occurred or that it may occur, they must notify their line manager or Human Resources Lead as soon as possible.

If employees are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager or Human Resources Lead.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If employees believe that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, employees should raise the matter formally using our Grievance Procedure, which can be found in the current employee handbook.

## **Communication and awareness of this policy:**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and employees.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **Breaches of this policy:**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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## Weidmann Whiteley commitments:

We will never knowingly pay any employee less than the minimum wage laid down by the UK Government.

We will never knowingly discriminate against any person regardless of their age, disability, gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religious beliefs, or sexual orientation.

We will apply the working time directive as far as is reasonably practicable.

- No-one should work more than 7 consecutive shifts
- The working day must not exceed 12 hours
- Time off site between two working periods must not be less than 11 hours

We will comply with the requirements detailed in the document FSC-STD-40-004 V3-1 Chain of Custody under Universal Requirements, section 7 FSC core labour requirements.

All employees will have a contract issued – this may take the form of an offer of employment letter setting out terms and conditions of employment, working hours and pay.

All employees will be required to provide proof of nationality and eligibility to work in the UK.

All employees have the freedom to leave site at the end of their working hours.

There is no lodging on site for any employee.

No child under the age of sixteen will be employed, except for the purposes of work experience arranged by and with the approval of the young person's school or place of education, as per the provisions of ILO138.

We expect that all our suppliers will adhere to the provisions of ILO138 applicable in their country. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



**David Botterill**  
General Manager

10<sup>th</sup> April 2024