

Modern Slavery Policy

in conjunction with
the Modern Slavery Act 2015

1 INTRODUCTION

- 1.1 This Policy sets out Cantillon Ltd 's actions to understand and address potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.
- 1.2 This Policy is written in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Cantillon Ltd' slavery and human trafficking statement for the 2018/19 financial year.
- 1.3 The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2 RISK AND COMPLIANCE

- 2.1 We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chains.
- 2.2 We do not consider that we operate in high risk sectors or locations. However, we recognise that there is always the potential for slavery and human trafficking to occur so we will regularly evaluate our supply chains.

3 ORGANISATION AND SUPPLY CHAIN

- 3.1 This statement covers the activities of Cantillon Ltd:
 - 3.1.1 Cantillon Ltd is an organisation that operates in the Demolition sector of the Construction Industry. Its expertise covers services based around our core business of demolition, including the design and provision of demolition, dismantling and related engineering disciplines, enabling works, piling, structural frame, groundworks, substructure and superstructure elements, asbestos removal, asbestos disposal and asbestos management, and transportation of materials to and from sites.
- 3.2 The organisation currently operates in the UK only.
- 3.3 Our supply chain is vetted by senior management and is made aware of our expectations with regard to this and other issues. We hold ongoing discussions with them to ensure that their staff are provided with suitable working conditions, a living wage and treated with dignity and respect.
- 3.4 We undertake responsible sourcing of construction products providing a holistic approach to managing a product from the point at which component materials are mined or harvested, through manufacture and processing. We understand the risk of potential ethical breaches in the manufacture of some supplies and have taken steps to obtain confirmation of the manufacturing location and ethical policies relating to these.

4 RESPONSIBILITY

- 4.1 Responsibility for the organisation's anti-slavery initiatives is as follows:
 - **Policies:** This policy is reviewed annually by the Managing Director and Senior Management Team; the processes and procedures updated and reviewed as required. The Managing Director holds responsibility for ensuring that this policy is adhered to.

- **Training:** Staff have been given an induction on the ethical expectations of our company, awareness of the modern slavery issues. The details of this policy is located within the Employee Handbook, reviewed and reissued regularly and available to all via the company system. We consult and involve direct and indirect employees to help develop a shared and positive attitude towards ethical responsibilities.

5 OTHER RELEVANT POLICIES

- 5.1 The organisation operates the following policies that support its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.
- 5.2 **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- 5.3 **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.
- 5.4 **Supply Chain code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with fairness, dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Agency workers policy The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Cantillon carries out a desktop audit (PQQ) to verify policies, procedures and systems of the agency, asking for verification of employment terms and conditions.

6 REVIEW

- 6.1 This Policy will be reviewed annually by the senior management team and authorised by the Managing Director


Paul Cluskey
Managing Director