

## **Anti-Slavery Policy**

### **1. POLICY STATEMENT**

1.1 Coltman Precast Concrete has a zero-tolerance approach to modern slavery and we are committed to applying and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

1.2 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, interns, agents, contractors, suppliers or any other people or bodies associated with the business.

### **2. RESPONSIBILITY FOR THE POLICY**

2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal obligations, and that all those under our control comply with it.

2.2 The Managing Director has primary and day-to-day responsibility in relation to our supply chain for implementing this policy and 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.

2.3 The HR Manager has primary and day-to-day responsibility in relation to those directly employed by us for implementing this policy and 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.

### **3. COMPLIANCE WITH THE POLICY**

3.1 All persons working for Coltman Precast Concrete must ensure that they read, understand and comply with this policy.

3.2 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. All persons working for Coltman Precast Concrete are required to avoid any activity that might lead to a breach of this policy.

3.3 All persons working for Coltman Precast Concrete are encouraged to raise concerns about any issue or notion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.

### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

4.1 This policy will be communicated to all Coltman Precast Concrete employees.

4.2 Coltman Precast Concrete employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

## **5. DUE DILIGENCE**

5.1 In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy.

## **6. BREACHES OF THIS POLICY**

6.1 Any breach of this policy will generally be treated as gross misconduct and may result in dismissal without notice.


6.2 We may terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

**Name:** David Smith  
**Director**

**Signed:** .....

**Date:** March 2023

**Name:** Kevin Hughes  
**Director**

**Signed:** .....

**Date:** March 2023