

1. POLICY STATEMENT

Sewells Reservoir Construction Ltd commits to developing and adopting a proactive approach to tackling Modern slavery and human trafficking exploitation.

2. COVERAGE

All activities undertaken by Sewells Reservoir Construction Ltd (SRC), and associated companies.

3. DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

4. COMMITMENTS

SRC shall:

- The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015
- The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- The Company strictly adheres to the minimum standards required in relation to its responsibilities under the relevant employment legislation.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

5. POTENTIAL EXPOSURE

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

6. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

- We limit the geographical scope of our operations to the UK, Ireland and Europe · Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point of contact is preferably with a UK or Ireland company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers

7. MEASURES

We use the following measures to check 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:

- Right to work checks completed at recruitment stage;
- Ensure minimum employment age adhered to, in line with the relevant legislation;
- Always apply national minimum wage thresholds, in line with the relevant legislation;
- Regular contact with suppliers including their understanding of, and compliance with, our expectations.
- Regular monitoring of training and skills within modern Slavery and Human Trafficking.

8. SLAVERY COMPLIANCE OFFICER

The Company has a Slavery Compliance Officer, Clare McGlone (HR Manager) to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company obligations in this regard.