

Modern Slavery Policy

1. Policy statement

1.1 It is our policy to conduct all of Keepmoat's business in an honest and ethical manner. We are committed to preventing modern slavery in all its forms, and ensuring that we implement and enforce effective processes, to eliminate the opportunity for modern slavery to exist within our business or within our supply chain. We will uphold all laws relevant to the Modern Slavery Act 2015.

1.2 This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors and employees (whether permanent, fixed-term or temporary) of the Keepmoat Group and our supply chain.

2. Purpose of this policy

2.1 The purpose of this policy is to outline the processes and practices that we have implemented, to ensure that modern slavery has no place to survive within our business, or our supply chain. This document sets out our responsibilities, and the responsibilities of those working for us, in achieving that goal.

2.2 This policy also provides information and guidance to those working for us on how to identify incidences of modern slavery, and how to respond to them in the most appropriate manner.

2.3 It is the responsibility of all Keepmoat employees to ensure that they familiarise themselves with this policy, and its associated provisions. It is the aim of the policy to provide a clear approach to our employees, sub-contractors, suppliers, clients and customers of our straight forward approach to proactively tackling this issue in the workplace.

3. Preventing modern slavery

3.1 Keepmoat will implement a number of measures to prevent modern slavery within our business and our supply chain. As part of this commitment, we will:

- Publish an annual statement outlining the measures that we have adopted in relation to modern slavery;
- Undertake regular risk assessments to identify vulnerable sectors of our business, and implement appropriate control measures;
- Conduct due diligence on sub-contractors and suppliers, to ensure that we only utilise sub-contractors and suppliers who are also committed to preventing modern slavery;
- Insert additional clauses in sub-contractor and supplier contracts, which promote our objective of preventing modern slavery; and
- Give training and guidance given to all staff, in preventing modern slavery.

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4. Responsibilities of our staff

4.1 All staff must ensure that they read, understand and comply with this policy. It is incumbent upon all members of staff to be vigilante to signs that modern slavery may be present in our business or supply chain.

4.2 We recognise that Keepmoat's staff are highly visible within local communities and work closely with colleagues, sub-contractors and suppliers. Our staff may also have access to our customer's homes in order to conduct the work that we do. As a result of this level of access, our staff may receive information, or witness behaviours which suggest that a person may be the subject of modern slavery. If an employee witnesses anything that they feel falls under this category, they must inform their line manager, or the project lead immediately, and not try to get involved in any such matters on an individual basis. Most contracts have a safeguarding protocol with the client to flag up any illegal activity. Any incidents would need to be reported under that procedure via the project lead to inform the appropriate individual from a client perspective. If an employee feels that the individuals are in immediate danger then they should contact the police on 999. Schedule 1 to this policy, provides a list of 'red flags', i.e. warning signs that modern slavery could be present.

4.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. Who is responsible for the policy?

5.1 Keepmoat's Chief Executive Officer 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 compliance officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.

Schedule 1

It may be difficult to identify any individuals who could be subject to abuse when working with or for Keepmoat. However, concerns could be heightened by the following 'red flags':

- Wages - wages being diverted from individuals and paid to a third party using cash or cheque or being paid via the same bank account; wages taken off individuals for accommodation, food or to pay off debt;
- Accommodation - Multiple occupancy at the same address and in dirty, cramped and overcrowded conditions;
- Statutory rights – lack of understanding of their basic statutory rights such as entitlement to sick pay, holiday pay and other benefits;
- Fees and Rates - Suspiciously low agency rates;

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- Legal documents and personal effects - legal documents such as passport being held by others or forged/false identity documents; individuals with few personal effects and the same clothes daily which are unkempt and seem unsuitable for the nature of the work;
- Physical signs - individuals showing signs of physical or psychological abuse; who look malnourished, unkempt or withdrawn;
- Control and Isolation – individuals who appear to be under the unnatural control and influence of others, travelling together, dropped off and picked up at unusual times either very early or very late; unfamiliar with their locality
- Fear – individuals with little trust of authority; fear of deportation; fear of violence; fearful of what will happen to their family; not knowing who to trust or where to get help.



Tim Beale
Chief Executive Officer
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