

## **Anti-Slavery and Human Trafficking Policy**

### **Purpose of the policy**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

This document sets out the policy of SYS (Scaffolding Contractors) Ltd. with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

SYS (Scaffolding Contractors) Ltd. have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.

SYS (Scaffolding Contractors) Ltd. maintain relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

As a company we expect all or who have, or seek to have, a business relationship with SYS (Scaffolding Contractors) Ltd. to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery policy.

SYS (Scaffolding Contractors) Ltd.’s whistleblowing Procedure is intended to provide guidance on how concerns can be communicated throughout the company.

Concerns about suspected modern slavery associated with SYS (Scaffolding Contractors) Ltd. or our suppliers may be reported by employees in this manner.

SYS (Scaffolding Contractors) Ltd. as a company, 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.

As a Company, SYS (Scaffolding Contractors) Ltd. are committed to ensuring no one suffers any detrimental treatment as a result 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 unfavorable treatment connected with raising a concern.

## **S.Y.S (Scaffolding Contractors) Ltd.**

SYS (Scaffolding Contractors) Ltd. will accept and take seriously concerns communicated anonymously by anyone.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective.

Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual

### **Training**

SYS (Scaffolding Contractors) Ltd. will ensure that the high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors, and senior management have been briefed on the subject.

### ***Compliance with this Policy***

SYS (Scaffolding Contractors) Ltd. aims to maintain high ethical standards when carrying out its business activities. Practices of any sort that are incompatible with the SYS (Scaffolding Contractors) Ltd. principles and policies will not be tolerated. Strict adherence to these principles and supporting policies are a condition of employment with SYS (Scaffolding Contractors) Ltd.

Ultimate responsibility for compliance with this policy rests with the SYS (Scaffolding Contractors) Ltd. Board of Directors. They will ensure that it is communicated to and understood by all employees whilst day-to-day responsibility for its implementation is delegated to senior management.

Failure to comply with this policy may lead to disciplinary actions and, where breaches of the law take place, may lead to criminal proceedings against the individual or individuals involved.

### **Review**

SYS (Scaffolding Contractors) Ltd. Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

**Signed:**   
**(Managing Director)**

**Date: April 2021**