

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

Highway Care have a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships. The company will implement and enforce effective systems and controls to ensure that modern slavery or human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

Policy

This policy applies to all Highway Care employees or anyone working on the Company's behalf in any capacity.

In order to effectively manage the risk of modern slavery and human trafficking, the Company commit to:

- Maintaining and updating policies in line with legislation and best practice, as a minimum, work to the National Minimum Wage.
- Tracking, monitoring, and preventing the risk of the occurrence through diligent management.
- Using our supporting HR function and recruitment companies as a third-party check of our recruitment and personnel policies.
- Audits where applicable of our supply chain and thorough supply chain due diligence.
- Investigating thoroughly any issues/concerns detected.
- Applying sanctions against those suppliers who do not conform to any legal requirements.
- Provide any appropriate/relevant training and guidance to employees.

Implementation & Procedure

The Company will be responsible for implementing this policy and ensure that all employees are aware through addition into the Staff handbook, new starter inductions, notice boards and regular communication.

Further training will be available through E-Learning, distribution of guidance documentation and classroom training.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or a Director. In line with the Company's Whistle Blowing Policy, everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

Highway Care will support anyone who raises a genuine concern in good faith under this policy and is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting their suspicion that modern slavery is or may be taking place in any part of the business or in any of its supply chain.

If found to be in breach of this Policy and/or involved in human trafficking the company will terminate any commercial relationships with its supplier.

Any employee found to be in breach of this policy will be subject to disciplinary action which may be treated as gross misconduct and subject to summary dismissal.

Signed:



Name: Adrian Bullock

Position: Engineering Director