



Policy Statement

Anti-Slavery and Human Trafficking

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Anti-Slavery and Human Trafficking Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Modern Slavery Act 2015 requires every organisation carrying on a business in the UK with a total annual turnover of £36m or more to produce a slavery and human trafficking statement for each financial year of the organisation.

With a current annual turnover of less than £11m Alan Wood & Partners is not legally obliged to have such a policy and does not need to publish such a statement. We do however recognise the need for our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

Given the nature of our business, our Board and Management Teams each consider that there is minimal risk approximating to no risk that, either within Alan Wood & Partners or the very limited supply chains which support our business activities, that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

The conditions of employment for all our employees and the procurement practices operated by Alan Wood & Partners ensure that we are rightly viewed as excellent and supportive employers.

However, as part of our ESG strategy, Alan Wood & Partners takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards of ethics from all of our sub-contractors, suppliers, and other business partners, we will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as anyone held in slavery or servitude, whether adults or children, in our contracting processes, and we expect our suppliers to hold their own suppliers to the same high standards.

Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Alan Wood & Partners works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

This policy applies to all individuals who work for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy is not part of any employee's employment contract, and we reserve the right to change it at any time.

Organisational structure and supply chains

This statement covers the activities of Alan Wood & Partners that include providing a full range of engineering services in all areas of the construction industry.

Alan Wood & Partners currently operates only in the United Kingdom.

Alan Wood & Partners utilises subcontractors and suppliers that are based within the UK. Where any supplier has activities outside of the UK they are required to inform us of this so that we can undertake an audit of the suppliers compliance with our code of conduct.

Alan Wood & Partners, where needed, uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Policy responsibilities

Alan Wood & Partners is ultimately responsible for ensuring that this policy conforms with any legal and ethical commitments, as well as that all people under our control abide by it.

Alan Wood & Partners oversees implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.

Management at all levels is responsible for ensuring that people reporting to them understand and comply with this policy, as well as ongoing training through our annual training plan on it and the subject of modern slavery in supply chains.

Alan Wood & Partners expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- Have a zero tolerance approach to modern slavery in our company and supply chains.
- The presentation, detection and reporting of modern slavery in any part of our company or supply chain is the responsibility of all those working for us or, on our behalf. Workers must not engage in, facilitate or fail to report any activity, that might lead to or suggest a breach of policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain

- We take a risk – based approach to assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk approach, we will also assess the merits of writing to our suppliers requiring them to comply with our practices, which sets out the minimum standards required to combat modern slavery and human trafficking.
- As part of our ongoing risk assessment and due diligence process, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our code of conduct.

Policy compliance

You must read, understand, and enforce this policy. The prevention, identification, and reporting of modern slavery in any element of our company or supply chains is the duty of everyone who works for us or is under our authority.

You must refrain from engaging in any action that might lead to or imply a violation of this policy.

If you feel or suspect that a conflict with this policy has happened or will occur in the future, you must contact your line manager or a business Director as soon as possible.

You are urged to express concerns about any issue or suspicion of modern slavery in any aspect of our business or any supplier tier's supply chain as soon as possible.

If you feel or suspect a violation of this policy has occurred or may occur, you must alert your line manager or a company director as soon as possible, or report it in accordance with our Whistleblowing Policy.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you have any doubts about whether a specific act, the treatment of employees in general, or their working circumstances inside any tier of our supply chains represents any of the numerous types of modern slavery, please contact your line manager or a company Director.

Alan Wood & Partners promotes transparency and will assist anybody who expresses serious concerns in good faith under this policy, even if those worries turn out to be incorrect. We are dedicated to ensuring that no one experiences any adverse treatment as a result of reporting in good faith their concern that modern slavery in any form is or may be occurring in any section of our own business or in any of our supplier networks.

Dismissal, disciplinary action, threats, or other unfavourable treatment as a result of voicing a concern is considered detrimental treatment.

If you suspect you have been subjected to such treatment, you should immediately notify your line manager. If the problem is not resolved, and you are an employee, you should file a formal complaint.

Communication and awareness

Training on this policy, as well as the threat Alan Wood & Partners faces from modern slavery in its supply chains, is part of the induction process for all new employees, and updates will be offered annual training plans and other Alan Wood & Partners established channels of communication between the company and you.

Our zero tolerance stance to modern slavery must be conveyed to all suppliers, contractors, and business partners from the beginning of our commercial engagement with them and reinforced as needed subsequently.

Policy breaches

Any employee who violates this policy may face disciplinary action, which might result in dismissal for misconduct. If other persons or organisations working on our behalf violate this policy, we reserve the right to terminate our relationship with them with immediate effect.

Performance indicators

Alan Wood & Partners reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation:

- Requires all staff to complete update training on modern slavery as part of annual training plans
- Has included supply chain verification of modern slavery policies as part of pre-vetting through our ISO 9001 : 2015 QMS procedures, whereby we evaluate potential suppliers before they enter the supply chain and
- Carries out a review the performance of all sub-contractors and suppliers on an annual basis and grade them on their performance as part of continued listing on our approved suppliers register.

The Managing Director, Board and Senior Management Team will ensure that this policy is used as the basis for the organisation and management of anti-slavery and human trafficking initiatives.

Employees have an obligation to comply with Alan Wood & Partners' processes and procedures that allow Alan Wood & Partners to fulfil its legal obligations. Employees who fail to fulfil or discharge their responsibilities satisfactorily may be subject to disciplinary action.

This policy applies to all people who perform services for or on behalf of Alan Wood & Partners, including all full and part-time employees, directors, agency staff / contractors and all persons employed by Alan Wood & Partners.

This policy has been produced for Alan Wood Partnership Limited T/A Alan Wood & Partners (AWP) and covers all of its regional offices.

This policy was approved by Alan Wood & Partners Board.

This policy is regularly reviewed in order to ensure its continuing suitability. As Managing Director of Alan Wood & Partners, I accept ultimate responsibility for the Anti-Slavery & Human Trafficking Policy Statement.



Mark Coates
Managing Director

Date: February 2024

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