

## Policy

# Slavery and Human Trafficking

Ian Williams is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the Company's position on the responsibility to be alert to the risks, however small, in our business and wider supply chain of slavery and human trafficking

This policy applies to all employees of the Company, and to temporary workers, consultants, subcontractors acting for, or on behalf of, the Company.

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## Policy Statement

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk:

- We manage our local offices to ensure optimum control of the work environment
- Where possible we build long standing relationships with local suppliers and customers 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 company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in our supply chain to at least, adopt a 'one-up' due diligence on the next link in the chain and where possible to have a direct relationship with all links in the supply chain
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and sub-contractors to comply with our values.

The Business Managers, Procurement Managers, General Managers and Directors are responsible for compliance in their respective departments and for their supplier relationships.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all relevant members of staff. All Directors have been briefed on the subject.

### **Our effectiveness in combating slavery and human trafficking**

We use the following key performance indicators (KPIs) to measure 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:

Completion of in-house audits by General Managers and Business Managers

Use of labour monitoring and payroll systems

Level of communication and personal contact with our supply chain and their understanding of, and compliance with, our expectations

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## Additional Authority

Not applicable

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## Scope

All Ian Williams employees

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## Governance

Human Resources are responsible for enforcing this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

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## Definitions

Not applicable

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## Review Cycle

This policy is reviewed annually.



Andrew Havard  
Managing Director

March 2019