

Approved: April 2020  
Review Date: April 2021

# Modern Slavery Policy

## Policy

# Modern Slavery

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.

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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 Modern 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 modern 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 whistleblowers

### **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.

### **Awareness**

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

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

Our commercial team undertake regular reviews of our supply chain to establish the likely risk of slavery and human trafficking. If required a risk assessment will be prepared. Should slavery and human trafficking be discovered it will be reported to the police immediately.

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## Additional Authority

Section 54(1) of the Modern Slavery Act 2015

## Scope

This Policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ("associated persons").

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## Governance

The responsibility for determining the Company's policies on modern slavery and human trafficking matters, including revision of this Policy, lies with the Directors of Ian Williams. 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 modern 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

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