

Policy Number:	HR52
Policy Name:	Modern Slavery

Introduction

This policy pertains to Neville Special Projects Limited, Neville Joinery Limited and Neville Trust Limited (hereinafter referred to as the Company).

Policy Statement

Modern slavery is a crime and violation of human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking. All of these have a common theme of deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The Company has a zero-tolerance to modern slavery and are committed to acting ethically and with integrity in all our business dealings including those within our supply chain. We will never knowingly employ the services of a third party who do not comply with zero tolerance of modern slavery.

Responsibilities

The Company Directors have ultimate responsibility in ensuring we maintain and action the zero-tolerance stance towards modern slavery. However, Managers of the Company must also ensure that their practices and interactions with third parties is in accordance with this Company policy.

It is also the responsibility of each employee to ensure they escalate any information which they may be in receipt of, or suspicions they may have, about activities which lead them to believe that someone with whom they have been working may be subject to modern slavery practices. You should immediately advise your Line Manager, a Director or the HR Manager of your concerns or suspicions.

Further, if you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions might be an act of modern slavery, you should immediately raise your concern with your Line Manager or the HR Department. The Company would prefer to be proved wrong on this matter than to allow an individual to endure modern slavery conditions.

The Company are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicions to us. (See also Policy HR20 – Whistleblowing)

Compliance

Our subcontractor chain is monitored and audited by the Best Practice Department who ensures all relevant and appropriate checks are conducted. There are many and varied commercial reasons for doing this and eligibility to work and modern slavery are encompassed within these checks.

The HR Department conduct eligibility to work checks on all potential new starters, prior to them starting work with us. Periodic eligibility to work checks are also conducted on all staff.

The Whistleblowing policy (HR20) is made available to all personnel working within any of the Company’s businesses. This policy enables staff members to raise legitimate concerns about specified matters. It makes provision about the kinds of disclosure which may be protected and the circumstances in which disclosures are protected.