

	<b>Bethell Construction Procedure</b>	Procedure Ref : BCL / HR / 26 Issue No. : 1 Issue Date : 20.03.2017 Originated By : Emma Walker Approved By : Vinny O'Dowd Page: Page 1 of 3
	<b>Modern Slavery &amp; Human Trafficking Policy</b>	

Bethell Construction Ltd recognises that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the "Act").

The Company takes a zero tolerance approach to non-compliance of this policy and will not tolerate any slavery or human trafficking in any part of its business or supply chain. This policy applies to all Bethell directors and employees, whether permanent or temporary, and the Company's supply chain.

Bethell Construction Ltd will take steps to ensure that modern slavery and human trafficking are not taking place within the business or supply chain. This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy. Where applicable suppliers must be accredited to an Achilles third party scheme in which Modern Slavery compliance is covered. All other suppliers must have submitted a Supply Chain Questionnaire which also covers the Act.
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards.
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms.
- Bethell will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its industry sectors and we will not knowingly support or deal with any business involved in modern slavery or human trafficking.
- Bethell will train appropriate employees to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

Every Bethell employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of unlawful practise. Any concerns may be reported to the Human Resources or HSQE Department.

Bethell considers a breach of this policy as a serious offence. Any violation of this Policy or Act by an employee may result in Disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Bethell will notify the relevant authorities of an individual or suppliers contravention of the Act.

This policy will be reviewed annually to ensure it reflect current legislation and regulations.

### **Related documents**

- Whistleblowing Policy and Procedure (BCL/HR/09)
- Disciplinary Policy and Procedure (BCL/HR/04)