

Title	Anti-Slavery Policy		
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<b>Version History</b>	<b>Date</b>	<b>Authorised</b>	<b>Changes Made (page # where applicable)</b>
1	01/09/2017	Ted McMullen	Addition of Modern Day Slavery Statement to the Anti-Slavery Policy, update of document references.

# Anti-Slavery Policy

LAKESMERE GROUP LTD

## LAKESMERE GROUP'S MODERN DAY SLAVERY STATEMENT

### Introduction

Modern slavery is a criminal offence under the *Modern Slavery Act 2015*. The Lakesmere Group is committed to preventing slavery and human trafficking across all its activities and supply chain arrangements.

### Structure

Lakesmere is a leading roofing, cladding & facade specialist contractor, offering a complete Building Envelope solution. We operate all over the UK from our regional offices in Winchester, Reading, Manchester, Moira, Portadown and Glasgow. In addition, we have undertaken contracts in the Middle East and Asia.

### Due Diligence and Supply Chain

Lakesmere does not and will not work with any party suspected of being connected with slavery. As part of our commitment to identify and mitigate risk we have taken the following steps:

- Assess risk to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas
- Engage with our suppliers to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not taking place in their businesses
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy.

### Effectiveness in combating slavery and human trafficking

In addition to this statement, Lakesmere's Anti-Slavery Policy contains a list of other policies affected by this requirement.

The following key performance indicators are used to measure how effective we have been to prevent slavery and human trafficking from taking place in any part of our business or supply chain:

- Compliance around use and review of labour monitoring and payroll systems
- Evidence of communicating clear expectations to staff and suppliers through training and awareness.

### Actions taken in 2016/17 financial year

- Issued Lakesmere Modern Day Slavery statement and displayed it on the company website
- Undertaken survey of suppliers around Modern Day Slavery awareness
- Updated Supplier Accreditation Form to develop Lakesmere's knowledge of its suppliers.

### Actions planned in 2017/18 financial year

- Increased training and awareness to staff involved in supply chain procurement
- Include Anti-Slavery Policy as part of staff induction
- Review relevant internal procedures and policies annually to ensure their effectiveness.



September 2017

Ted McMullen - Chief Executive Officer, Signed on Behalf of the Board of Directors

## Introduction

Modern slavery is a criminal offence under the *Modern Slavery Act 2015*. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal and/or commercial gain. The aim of this Policy is to prevent opportunities for modern slavery to occur within Lakesmere Group business or supply chain.

As a group, we have a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery isn't taking place anywhere in our and our suppliers' businesses.

The company will not knowingly support or deal with any business involved in slavery or human trafficking.

## Steps for the prevention of modern slavery

We acknowledge our responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. We expect the same high standards from all of our contractors, suppliers and other business partners.

Employees of Lakesmere Group have an obligation to familiarise themselves with this policy and other related policies and procedures as listed in this document, to help in the identification and prevention of modern slavery and to conduct business in a manner that every opportunity for and incidence of modern slavery is prevented.

Whilst we recognise our obligation to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain. In order to comply with the act we will take the following steps:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- Engage with our suppliers to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not taking place in their businesses (e.g. questionnaire sent to suppliers);
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and those of their supply chain (where possible).

## Responsibility

The board of Directors is ultimately responsible for the prevention of modern slavery within all companies that are part of Lakesmere Group.

Leaders of HR, SHE, Construction, Commercial and Procurement teams are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on this policy and modern slavery.

## How to report Modern Slavery?

The Company's whistleblowing procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected Modern Slavery within the Company or our suppliers may be reported by employees, contractors and agency workers in this manner. The whistleblowing policy can be found on the Company's intranet site in the HR section or requested from our HR department.

Alternatively you can contact the Modern Slavery helpline on 0800 0121 700 and report any suspected intention or action of Slavery within a subsidiary of the Lakesmere Group or within any of its suppliers.

Or you can contact the *Public Concern at Work* helpline which operates a confidential helpline on 0207 4046609.

## Safeguard

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion of modern slavery taking place in any part of the Lakesmere Group or in any of our supply chains. The Company will accept and take seriously concerns communicated anonymously.

Any employee who is, after investigation, found to have made a malicious or vexatious claim or allegation or not acted in good faith will be subject to action under our disciplinary procedure and externally by recourse to the courts.

## Communication and awareness

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the start of our business relationship and reiterated as needed.

This policy will be published on the Company's intranet and distributed to employees who haven't got a work computer and everyone will be requested to read it. Additionally, members of the Operation, HR and SHE teams will also be requested to read other related external documents and complete e-learning training (e.g. Sustainability School e-learning).

## Review

Following its initial adoption, this policy will be reviewed by the Company's board of Directors on a regular basis and will be used to inform our Modern Slavery statement on the Company's website.

## Related policies and procedures

QD59 Whistleblowing Policy

QD65 Recruitment and Selection Policy

QD82 Eligibility to Work in the UK Policy

QP72 Subcontractor Right to Work Procedure

PUR.P.002 Supplier Selection and Control Procedure