

Anti-Slavery and Human Trafficking Policy

Policy Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors and suppliers.

Northfield Construction Limited strictly prohibits the use of modern slavery and human trafficking in our operations. As a business we are committed to act ethically, being open and honest in our business relationships and to implement effective systems and procedures to, as far as is practicably possible, ensure that slavery and human trafficking does not take place anywhere in the business or supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Risk Assessment and Due Diligence

We are a construction company based and operating solely in the UK. The key areas of our business that could be affected by modern slavery are directly hired employees, labour provided by our subcontractors, contingent supplied agency workers on our sites and the workforce of our supply chain (predominately UK suppliers) who supply materials to our business.

Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- We aim to build long standing relationships with suppliers and sub-contractors, communicating our expectations very clearly.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We may require employment and recruitment agencies, other sub-contractors and other third parties supplying workers to our organisation to confirm their compliance with this Code of Conduct.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- Relevant staff will receive instruction on the risks of modern slavery and human trafficking in our business and supply chains, so they are aware of potential problem areas, and all directors will be briefed on the subject.

Breaches of this Policy

Any employee who breaches this policy will be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed on behalf of the Board of Directors of Northfield Construction Limited


Duncan Oughton, Director