

ANTI SLAVERY POLICY

This policy statement sets out the steps that Harringtons Builders PLC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Harringtons Builders PLC has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Our labour force is a mix of directly employed and specialist sub-contractor trades. The vast majority of our suppliers are UK based.

We will adopt due diligence when dealing with any suppliers of labour and strive to monitor our own policies to regulate sub-contractors to ensure they are complying with the Modern Slavery Act 2015. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help
- Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will
- Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal
- Code of Business Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act

Harringtons Builders PLC operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to this, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- For UK based suppliers, they pay their employees at least the National Minimum Wage or National Living Wage as appropriate
- For International suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate any contract at any time should any instances of modern slavery come to light

We conduct training for our procurement team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within or business supply chain if:

- No reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified

This Policy will be communicated to all staff, contractors and suppliers and will be reviewed as a minimum annually.

Endorsed by



SCOTT CARR
Director of Health, Safety & Environment
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| Process Owner: | Scott Carr | | Deputy Process Owner: | Marius Chiratcu |