

# Anti-Slavery and Human trafficking policy

Experts in perimeter protection



## Introduction

Modern slavery is a term used to include slavery, servitude, forced and compulsory labour, bonded and child labour, and human trafficking. Victims are coerced, deceived, and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery and human trafficking are illegal and violate fundamental human rights.

Forms of modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.

Heras prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

## Policy statement

We expect everyone working with us or on our behalf to support and uphold the law relating to modern slavery. We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. 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 are committed to engaging with our stakeholders and direct suppliers to address the risk of modern slavery in our operations and supply chain.

As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our anti-slavery and human trafficking policy and the Modern Slavery Act 2015. (is the case in the UK, will we do that everywhere?)

Our recruitment procedures require employment and recruitment agencies and other third

parties supplying workers to our organisation to comply with the Modern Slavery Act 2015. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to our policy.

## Policy application

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, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

## Responsibility for the policy

Heras is committed to making available sufficient resources for the implementation of this policy and has overall responsibility for ensuring compliance. The Steering Team has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and issue the policy to any companies in our supply chains.

## **Reporting modern slavery**

Employees must notify a manager or a member of the HR department as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future, or have any concerns or suspicions relating to compliance with this policy.

If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify the HR department as soon as possible.

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 that nobody suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **Breaches of this policy**

Any employee who breaches this policy will face 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.

**Should you have any questions about this policy, please speak to your manager or contact a member of the HR team.**

Published by	Heras
Contact Person	Country HR Manager
Purpose	Ensure transparent and compliant business conduct
Application / Distributed to	All employees
Classification	Public
Monitoring	Executive committee
Version	V_1.1
Signed off by / on	Board Heras

