

# Anti-Slavery and Human Trafficking Policy & Procedure (Modern Slavery Act 2015)

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<b>1.0</b>	<b><u>Policy Statement</u></b>
1.1	Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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 or commercial gain.
1.2	Quinn Infrastructure provide <b>design, installation and maintenance</b> of mechanical, electrical, fire detection and suppression systems, LED lighting, air cooling and building services. Our services cover a customer base including transport, retail, commerce, public services, education and hospitality. Although, the majority of the suppliers we partner are UK based, we do source products from International companies situated in China.
1.3	Quinn Infrastructure endeavour to carry out thorough checks on all our suppliers to ensure they are taking the necessary steps to comply with the act. As a business we undertake all reasonable and practical steps, including factory, warehouse and office inspections and audits where possible, to ensure standards are being adhered to and that local legislation and regulations are complied with. Any discrepancies found will be dealt with on a case by case basis in order to tailor remedial action appropriately.
<b>2.0</b>	<b><u>Objective</u></b>
2.1	We are committed to ensuring there is a transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.
2.2	As a business we aim to act ethically and with integrity in all business dealings and relationships implementing controls to ensure modern slavery is not taking place anywhere in our business or those of our suppliers.
<b>3.0</b>	<b><u>Scope</u></b>
3.1	<p>This Anti-Slavery and Human Trafficking Policy &amp; Procedure applies to all Quinn Infrastructure Employees, irrespective of job or grade, who are in full-time or part-time employment and are on permanent, fixed-term or temporary contracts of employment.</p> <p>The policy is also applicable to Contractors, Consultants, Vendors, Business Partners and any other parties who have access to company data and carry out work on behalf of our Company.</p> <p>This policy and procedure does form part of the individual contract of employment and may be changed by Quinn Infrastructure at any time at its absolute discretion.</p>
<b>4.0</b>	<b><u>Legislation</u></b>
4.1	Modern Slavery Act 2015
<b>5.0</b>	<b><u>Terminology</u></b>
5.1	Modern Slavery Act 2015 – is an Act of Parliament that is designed to tackle <u>slavery</u> in the UK and consolidates previous offences relating to <u>trafficking</u> and slavery.
<b>6.0</b>	<b><u>Responsibility</u></b>
6.1	The ultimate responsibility for the prevention of modern slavery rests with the Board of Directors and the Company's Management Team to ensure this policy is implemented and complies with legal and ethical obligations.

6.2	Managers and Team Leaders at every level will be responsible for ensuring their direct reports are fully aware of this policy and comply with any prevention and control methods in place.
<b>7.0</b>	<b><u>Prevention and Control Methods</u></b>
7.1	<p>Quinn Infrastructure expects each of its business partners to conduct their business with the same commitment to ethical business practices as itself. The workplace practices that we expect from our suppliers include:</p> <ul style="list-style-type: none"> <li>• Suppliers are not to use slave labour, illegal child labour or forced labour.</li> <li>• Suppliers will ensure that the overall terms of employment are voluntary.</li> <li>• Suppliers shall follow all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits.</li> <li>• Suppliers shall follow all local applicable laws pertaining to the number of hours worked in a seven (7) day week.</li> <li>• Suppliers will annually certify that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.</li> </ul> <p>Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of Quinn Infrastructure.</p>
7.2	Quinn Infrastructure issue supplier questionnaires to all new and existing suppliers in order to analyse the risk of using the prospective partner and to ensure they conform to the Modern Slavery Act 2015.
7.3	Quinn Infrastructure endeavour to visit supplier premises to carry out site audits on operational activities, both routinely and at times of reasonable suspicion.
<b>8.0</b>	<b><u>Whistle Blowing – Reporting an Act of Anti-Slavery and Human Trafficking</u></b>
8.1	Quinn Infrastructure encourage Employees to voice their concerns regarding the Modern Slavery Act 2015. The Company's Whistleblowing Procedure will provide guidance on how any concerns can be communicated. This can be requested from HR.
8.2	Employees can raise concerns regarding breaches of the Modern Slavery Act 2015 by approaching a Divisional Director or an equivalent Senior Leader or Human Resources.
8.3	Quinn Infrastructure aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy.
<b>9.0</b>	<b><u>Breach of Policy</u></b>
9.1	Any Employee that breaches this policy will be dealt with through the Disciplinary Policy & Procedure which may lead to their dismissal for Misconduct or Gross Misconduct.
9.2	Quinn Infrastructure may terminate any agreements or contracts with suppliers or business partners should they breach this Policy.