

Approved:  
Responsible Director: Chris Gallagher (OD) Mark Connor (CEO)  
Review Date: July 2020

# vermont

## **Vermont Construction Ltd Policy Statement with regards to the Modern Slavery & Human Trafficking Act 2015.**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that **Vermont Construction Limited** 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 including child labour. We have a zero-tolerance approach to modern slavery and 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 is not taking place anywhere in our own business or in any of our supply chains.

### Our policies

It is the policy of **Vermont** to:

- ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business by providing training to relevant staff;
- pay all staff at least the minimum wage rate applicable;
- comply with all legislation, importantly the Immigration Act 2015;
- strive to build long standing relationships with our suppliers & sub-contractors;
- ensure that all employees are made aware of their individual obligations in respect of modern slavery & human trafficking;
- encourage the reporting of concerns and the protection of whistle blowers, by way of our Whistleblowing Procedure;
- ensure that all staff, including temporary workers, have a written contract of employment;
- 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;
- ensure all staff know their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to;
- use indicative pricing statistics to assess fees from agencies offering or charging suspiciously low rates; and
- Ensure compliance of this policy through management meetings, site visits, internal & external audits.

### Our Suppliers

**Vermont** remains committed to maintaining and improving systems and processes to prevent human rights violations related to our own operations & that of our supply chain.

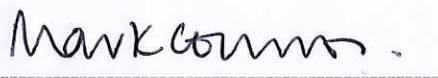
We expect the same high standards from all of our contractors, suppliers and other business partners and expect them to have suitable anti-slavery and human trafficking policies & processes.

**Vermont** vets its external contractors with our Pre-Qualification Questionnaire to ensure they have the requisite accreditations and are appropriately qualified for the roles they are asked to undertake.

As part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business;
2. They hold their own suppliers to account over modern slavery; and
3. They pay their employees at least the national minimum wage / national living wage as currently legislated.

We may terminate a contract with a supplier at any time should any instances of modern slavery or human trafficking come to light.



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**Mark Connor**  
Vermont Chief Executive

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