

Modern Slavery and Human Trafficking Statement

The purpose of the Modern Slavery Act 2015 is to prevent slavery and trafficking and the Act created a number of new criminal offences with increased penalties and greater powers of the police and border forces. The Act encourages businesses to take steps to address modern slavery within their business and supply chain.

Policy Statement of Total Construction Ltd

This statement sets down the steps that Total Construction Ltd has taken, and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery includes slavery, servitude, human trafficking and forced labour. Total Construction Ltd takes a zero tolerance approach to any form of modern slavery and we are committed to acting ethically and with integrity and transparency in all business dealings by putting effective systems and controls in place to safeguard against any form of modern slavery taking place.

We are also committed to ensuring there is clarity in our own business and in our approach to dealing with modern slavery throughout our supply chains in line with our disclosure obligations under the Modern Slavery Act 2015. We therefore expect the same high standards from all of our contractors, consultants, suppliers and other business partners. We also expect our supply chain to impose the same standards on their own supply chain and therefore we require this policy to be included in our supply chain contracts and appointments and for it to be complied with.

The scope of this Policy applies to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, sub-contractors, agents, external consultants, third party representatives and business partners.

Our suppliers

We are committed to ensuring there is no modern slavery or human trafficking in our supply chain or any part of our business and to acting ethically and with integrity in all of our business dealings and relationships. We expect the same high standards from all of our contractors, suppliers and other business partners.

We will only use well regarded recruitment agencies and will continue to ensure that all employee checks are undertaken to confirm eligibility to work.

Responsibility for the Policy

- The Total Construction Ltd Directors have overall responsibility for ensuring that this Policy complies with all legal and ethical obligations and to ensure that all employees and our supply chain comply with it.
- The Managing Director has primary and day to day responsibility for the implementation of this Policy, monitoring its use and effectiveness, dealing with any questions about it and periodic auditing of relevant internal control systems and procedures to ensure they are adequate in countering modern slavery.
- Management at all levels are responsible for ensuring those who report to them understand and comply with this Policy through adequate and regular briefings on it and the issue of modern slavery in supply chains.
- The Managing Director will encourage comments, suggestions and questions from employees on the Policy, its implementation and content. This will assist the business in effective review of the document.

Implementation of the Policy

All employees, sub-contractors, suppliers and other business partners must:-

- Ensure they read, understand and comply with this Policy;
- Prevent, detect and report modern slavery in any part of the Total Construction Ltd.'s business or its supply chains;
- Avoid any activity that might lead to or suggest a breach of this policy;
- Raise concerns with the Managing Director at the earliest opportunity if they suspect that there is any issue under this Policy that may have occurred.

The Directors of Total Construction Ltd will ensure that no one suffers any detrimental treatment as a result of reporting, in good faith, any suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connection with raising concern under this Policy.

Communication and Awareness of this Policy

Briefing of this Policy and the implications for Total Construction Ltd arising from modern slavery in its supply chain is included in the induction process for all employees and contractors. Suppliers and business partners will also be made aware of our zero tolerance approach to modern slavery at the outset of our business relationship with them and reinforced appropriately thereafter.

Our work policies and procedures will be reviewed and updated to include our policy statement on modern slavery and human trafficking and we will provide guidance on how any related concerns can be reported.

Breaches of the Policy

Any employee who, after investigation, is deemed to be in breach of this Policy will be subject to disciplinary action which may result in his/her dismissal.

The business relationship with sub-contractors, suppliers and business partners will be terminated in the event of a breach of this Policy.

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Guy Butler
Managing Director

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Neil Baker
Commercial Director

Mar 18