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RN WOOLER & COMPANY LTD – OUR COMMITMENT TO COMBATING MODERN SLAVERY

Slavery & Human Trafficking Policy Statement

This statement is made pursuant to **section (54)1 of the Modern Slavery Act 2015** and constitutes the company's slavery and human trafficking statement for the current financial year. This statement outlines the steps that **RN Wooler & Company Ltd, RN Wooler & Company (Holdings) Ltd** and **RN Wooler & Company (Developments) Ltd** have taken to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Introduction

R N Wooler & Company have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. All employees are expected to be aware of and to follow the guidance outlined in the company's Anti-Slavery and Human Trafficking Policy and report concerns.

Managers of the company are required to act whenever any concerns are raised whether from within or from outside the business.

Company Structure

We are a family run construction company based solely in the UK. The company has its head office in West Yorkshire.

We are committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in the company or our supply chain. We Comply with local minimum wage laws and do not employ child labour. All of our employees are:

- Paid by bank transfer, we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour.
- All our employees are vetted for the right to work in the country. Where employees require a work permit/VISA we ensure that they have all the necessary documentation in place.

Supplier Chain

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. We are



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committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with our suppliers and subcontractors and make clear our expectations of business behaviour.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- We operate a supplier/subcontractor verification process. We give all suppliers/subcontractors a copy of our anti – slavery statement, request and review a copy of their statement.
- We request that all our supply chain are registered and validated via Constructionline membership.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values. The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All directors have been briefed on the subject.

Failure to Comply

A failure to comply with the Act, and/or this policy statement will be deemed to be a material breach of the terms of our standard commercial agreements and contracts of employment.

Approval for this statement

This statement was approved by the Board of Directors on October 12th 2018 and will be reviewed annually.

A handwritten signature in blue ink, appearing to read "Andrew Wooler".

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Andrew Wooler
Director