



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

DT Civils Limited is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation, with suppliers of goods and services that make up the supply chain within DT Civils Limited.

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically. This policy statement will be reviewed annually and published.

Our high-risk areas

The nature of the construction industry means that our staff need to remain diligent at all times to eradicate opportunities for potential traffickers to gain access to our business. We have briefed our staff to be aware of the likely signs of modern slavery and bonded Labour and to be alert for any signs of exploitation within the recruitment and supply of temporary sub-contracted/Labour.

This Policy considers, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. The implementation and operation of this management system underlines our commitment to this policy.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company such as;

- Recruitment policy. 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.
- Bank account policy. In order to prevent a worker being exploited by another individual or potential trafficker we have a strict policy with regards to individuals only being paid into their own bank accounts or of an obvious family member and only two people per account. This is monitored to ensure adherence to the policy
- All temporary workers are clearly advised that they cannot be charged for work services and asked to alert us if they have been charged.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns, or practices within our business or supply chain, without fear of reprisals.
- Information is clearly displayed within our offices regarding the risks of modern slavery and the message of the "Stronger together" principles.

These policies are regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.



Our suppliers

We are currently working on evolving our supply chain compliance program to include due diligence on our suppliers and potential suppliers to further ensure that those suppliers are not using slave or trafficked Labour and understand the requirements of the Modern Slavery Act 2015.

Our Clients

We work with our clients' in order to ensure that there is a transparency within the supply chain and to ensure that our client's businesses are protected.

Training

All our internal staff receive training, both internal and external, along with regular updates to ensure they understand their obligations towards the eradication of Modern Slavery and are taught to spot the signs of potential exploitation and to raise their concerns to Senior Management and the appropriate authorities

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

It is the responsibility of all members of staff to read, understand and comply with the contents of this policy.

Signature:

A handwritten signature in black ink that reads "Mike Sibley". The signature is written over a large, faint, multi-colored circular graphic that is part of the DTCIVILS logo.

DTCIVILS

Name: Mike Sibley

Position: Managing Director

Date: 30th June 2017