



Modern Slavery Policy

PT-CP-470

Issued By/Contact: Group People Director

1. POLICY

- 1.1 Slavery and human trafficking ("Modern Slavery") are crimes and a violation of human rights.
- 1.2 Osborne has a zero-tolerance approach to Modern Slavery – any instance of Modern Slavery in Osborne's business or supply chain is a breach of the core values of the business.
- 1.3 Osborne recognises that the construction industry presents a risk of Modern Slavery and also that Modern Slavery could affect our business and supply chain. Low skilled immigrant workers are particularly vulnerable. Osborne therefore takes steps to reduce the risk of Modern Slavery being connected to its business or supply chain.
- 1.4 The following key principles apply to Osborne's business and our supply chain:

- 1.4.1 Child labour must not be used.
- 1.4.2 Any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice.
- 1.4.3 Passports, visas and other personal documentation should not be taken from workers.

- 1.4.4 All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation expenses or some other costs that they have no or little opportunity to repay.
- 1.4.5 Compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits.
- 1.4.6 Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health.
- 1.5 On an annual basis we will publish an anti-slavery statement which will set out our approach to prevent slavery and human trafficking in connection with our business.

2. PROCEDURES

- 2.1 We are committed to implementing and enforcing effective systems and controls to ensure slavery or human trafficking are not taking place anywhere in our own business or in any of our supply chains. These systems and controls include: this policy; risk assessments; a supply chain protocol; tendering assessment criteria; a whistleblowing policy; contractual controls; and induction and monitoring at sites.



POLICIES & STATEMENTS



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2.2 Our subcontractors, consultants and suppliers are contractually required to maintain similar effective systems and controls to ensure Modern Slavery is not connected to their services to Osborne.

3. **POLICY RESPONSIBILITY**

3.1 The Group People Director will be the lead role for the review and administration of this policy.

4. **REPORTING CONCERNS**

4.1 Guidance on reporting suspected slavery can be found at the Home Office's website:
www.modernslavery.co.uk.

4.2 Suspicions of Modern Slavery existing or being connected to Osborne's business or supply chain can also be reported to your regular contact at Osborne or be raised with Osborne's Group People Director.

5. **COMMUNICATION**

5.1 This Policy will be communicated to all employees, with updates issued as and when required through Policy Hub. It will also be available on Osborne's website.

1st October 2017 – V1.01

