



Issued By/Contact: Chief Operating & Financial Officer

1. POLICY

1.1 Slavery and human trafficking ("Modern Slavery") are crimes and a violation of human rights. Modern Slavery can take various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

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. 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, for example, where an individual may be tricked into working for little or no money to repay a debt, 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.

1.6 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, , contractors, external consultants and third-party representatives.

1.7 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

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.

2.2 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.

- 2.3 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 Finance Director will be the lead role for the review and administration of this policy.

- 3.2 You must ensure that you read, understand, and comply with this policy.

4. REPORTING CONCERNS

- 4.1 The prevention, detection, and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 4.2 You must notify your regular contact at Osborne or Osborne's Group Finance Director at the earliest possible stage if you believe or suspect modern slavery exists or is being connected to Osborne's business of supply chain. Guidance on reporting suspected slavery can be found at the Home Office's website: www.modernslavery.co.uk.

- 4.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of Modern Slavery, raise it with your regular contact at Osborne as soon as possible.

- 4.4 Guidance on reporting suspected Modern Slavery can be found at the Home Office's website: www.modernslavery.co.uk.

- 4.5 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

- 4.6 We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

- 4.7 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should notify your regular contact at Osborne immediately.

5. TRAINING AND COMMUNICATION

- 5.1 Training on this policy, and on the risk our business faces from Modern Slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

- 5.2 Our zero-tolerance approach to Modern Slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

6. BREACHES OF THIS POLICY

- 6.1 Any employee who breaches this policy will face disciplinary action, which could



result in dismissal for misconduct or gross misconduct.

- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

7. ADDITIONAL CONTACT INFORMATION

- 7.1 Our external whistleblowing hotline 'Protect' is available to you to raise concerns: phone: 0207 4046609 or email: whistle@protect-advice.org.uk

- 7.2 National helplines (which are available in any language) and reporting are as follows:

7.2.1 Modern Slavery Helpline – 0800 0121700 (24 hours) or www.modernslaveryhelpline.org/report

7.2.2 Gangmasters and Labour Abuse Authority – 0800 4320804 (09:00 – 17:00) or email: intelligence@gla.gov.uk

- 7.3 If you're worried that the individual is in immediate danger, phone 999.

Peter Duff
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