
Anti-Slavery & Anti-Trafficking Policy Statement

Version Control Table

| Version | Date | Author | Changes |
|---------|------------|---------------|---|
| 0.1 | 06/08/2017 | Will Bailes | Creation |
| 0.2 | 06/08/2018 | Justin Beavan | Authorising Signature Added & Policy Name Changed |
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Anti-Slavery & Anti-Trafficking Policy Statement

CES Northwest Limited are 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.

Our Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within CES Northwest. 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 from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. 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 and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published. This Policy considers and supports the policies, procedures and requirements documented in our Integrated Management System. 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, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

This statement is made pursuant to S.54 of the Modern Slavery Act 2015 and sets out the steps that CES Northwest has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. CES Northwest has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Risk Assessment and Due Diligence

Following a research based risk assessment focussing on factors such as levels of staff turnover, procurement controls, outsourcing arrangements and levels of unskilled work, the area of greatest (although moderate) risk is construction.

The risk has been included within our operational risk map and controls have been documented which will be subject to annual reviews.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help [see below].

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.

Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees to act.

Our suppliers

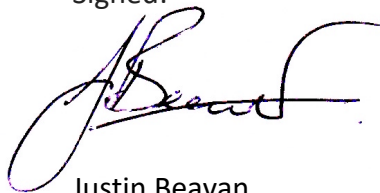
CES Northwest Limited operates a supplier policy and undertakes due diligence on all suppliers that are procured through the Public Contract Regulations 2015. This due diligence includes a statement that each supplier is required to complete to show that the organisation has never been convicted of offences relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

They have taken steps to eradicate modern slavery within their business.

1. They hold their own suppliers to account over modern slavery.
2. They pay their employees at least the national minimum wage / national living wage (as appropriate).
3. They pay their employees any prevailing minimum wage applicable within their country of operations.
4. We may terminate the contract at any time should any instances of modern slavery come to light.

We offer training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Signed:



Justin Beavan
Head of Operations & Technical Director