

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Policy Statement

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Within Project:interiors Limited, we have a zero-tolerance approach to modern slavery. We are committed to driving out acts of modern-day slavery and human trafficking by acting ethically and with integrity in all our business dealings and relationships. We endeavour to implement and enforce effective systems and controls to ensure modern slavery is not taking place in any activity related to our business or throughout our supply chain, including subcontractors and partners. The company will not support or deal with any business or individual knowingly involved in slavery or human trafficking. We acknowledge our responsibility to the Modern Slavery Act 2015 and will ensure transparency within our Organisation. This shall include the communication of Project:interiors’ Policy and implementation of our anti-trafficking procedure throughout our full supply chain to the best of our ability. The full supply chain refers to both suppliers of goods and services to the organisation as well as our own employees and any other stakeholders of Project:interiors Limited. We expect the same high standards from all of our Contractors, suppliers and other business partners, and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The Company pledges to ensure adequate levels of management control required for these sources and will continually monitor this. The Board of Directors and senior management shall take responsibility for implementing this policy and its objectives and shall provide adequate resources to monitor our risk and control measures through various channels to ensure that slavery and human trafficking is not taking place within the organisation or within our supply chains. Our monitoring methods shall include, but are not limited to;

- o Training of site staff to spread awareness of this issue
- o Making our Policy available to all employees,
- o Close monitoring of branch operations by Senior managers,
- o Consideration of feedback from contracts staff and site operatives,
- o Through one-to-one career assessments with staff
- o Through ensuring we continue to utilise the resources of Constructionline in engaging suppliers
- o Through liaising with Constructionline to set up ‘meet the contractor’ events UK-wide
- o Through attending conferences and events in relation to this topic to make certain that we keep up to date with current legislation and implement adequate procedures.

The Board of Directors reviews this policy and our monitoring procedures annually.

For and on behalf of Project Interiors –
Managing Director, Stuart Ackroyd



(PROJECT:INTERIORS LIMITED)

Written: 15th November 2019
Review Date: 14th November 2020

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Clarification

Modern slavery crimes are being committed across the UK and there have been year on year increases in the number of victims of modern slavery identified in this country. These crimes are taking place in factories, fields, brothels and even in homes up and down the country.

At present, Project:interiors are using best practice guidance offered, which has been implemented throughout our organisation where relevant.

People at risk

There is no typical victim of slavery – victims can be men, women or children of all ages and nationalities. Many victims are foreign nationals who are brought to the UK specifically so they can be abused and exploited for the benefit of others. Some are tricked in to believing they are simply paying others to facilitate their journey to the UK, or that they are being smuggled here. Many often do not find out that they are destined for a life of abuse and servitude until after they arrive. We also recognise that there have also been cases of vulnerable UK nationals being exploited in this way.

Forms of hidden labour exploitation

- Psychological violence, harassment and intimidation
- Violence or threats of violence against the worker and/or their family
- Threat or actual loss of job or withholding of work
- Being bonded through financial debt
- Threats to expose the worker to the authorities (e.g. because of the worker’s immigration status or offences they may have committed on the past)
- Withholding the person’s passport and other identification documents
- Control of the bank accounts where wages are paid, with the bulk of their weekly pay being removed and pittance left for personal use

Third party labour exploitation

Third part labour exploitation is exploitation of job applicants and workers by someone other than the employer or labour provider. In relation to Bell Group, this may be characterised by our supply chain; including furniture manufacture, paint manufacturers, builder’s merchants, subcontractors or any other third party our organisation uses to assist in the delivery of our business activities.

Procedure - Monitoring measures and red flags

Supplier Agreements

Senior members of Project:interiors staff, who are responsible for forming relationships with our suppliers, shall visit factories, premises and manufacturing sites belonging to our suppliers where it is possible to do so. Contracts Staff shall remain vigilant in dealing with Subcontractors; whilst visiting their premises and liaising with their employees. If our members of staff aren’t satisfied with the treatment of personnel employed by our suppliers or subcontractors, or, we suspect slave labour or human trafficking, members of staff are required to report this to their Project:interiors Line Manager

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in addition to Gangmasters Licensing Authority on 0800 432 0804 or the Modern Slavery Helpline on 0800 0121 700.

Supply Chain Approval TIER 1

Project:interiors has recently changed the supplier approval process to incorporate a review of the 'Modern Slavery' controls undertaken by our suppliers and subcontractors. We operate a 2-tiered process: As of September 2019, we partnered with Constructionline, as a Gold Status member for Project:interiors, to manage the Company's full supply chain and henceforth, all purchasing staff shall employ subcontracted services or purchase materials and goods from those Companies tagged to Project:interiors through the Constructionline website where possible. Login details can be obtained from the Health, Safety, Environmental & Quality, the office or the Contracts Managers. Purchasing staff can utilise the Constructionline database to also access further potential candidates / companies for the supply of goods or services and request for those new suppliers to be added to our approved list.

Through the stringent pre-approval controls set by Constructionline, as well as appraisal from other construction professionals, the Company is substantially mitigating any risks of engaging suppliers or subcontractors who are employing illegal labour or purchasing from illegal sources.

Supply Chain Approval TIER 2

Companies unable to attain Constructionline Accreditation for any valid reason, pre-approved by Project:interiors management, shall be required to provide a SSIP accreditation (where relevant) and all information required by Project:interiors' Internal Approval Process, before being permitted to supply any products or services to the Company. Our Supplier Questionnaire requires potential suppliers to confirm that all their employees have a valid permit to work in U.K. Our approval questionnaire also includes a statement to enforce policies relating to human trafficking or modern slavery, which potential and current suppliers are required to sign before commencing work with us, stating their commitment to:

- Only interview applicants in an approved location
- Not allow applicants to complete registration documents on behalf of others
- Not accept money, favours or gifts at all for potential applicants
- Not loan any personal money to temporary workers
- Declare if they have been informed by a worker, that the worker paid money to be introduced to the organisation
- Declare and investigate when suspecting an individual of introducing job applicants to the company for personal gain
- Not threaten or subject workers to physical treatment or mental mistreatment
- Treat applicants and workers with dignity and respect
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to senior management immediately.

Recruitment, Selection and Human Resources

In implementing the Company's Policy against slavery and human trafficking within our own internal recruitment and selection processes, as part of our due diligence, all Quality Auditors as well as our

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wages department are instructed to be on full alert to identify any individual who shows signs of being influenced or exploited, in particular by anyone other than a spouse or partner, and to escalate any concerns to a member of Senior management. This can include:

- The request of payment of weekly wage or monthly salary to a bank account in the name of any other individual.
- Signs may also include; phone calls from unrelated individuals posing unusual questions in relation to an employee,
- threatening correspondence,
- signs of stress or trauma of any employee,
- visible physical injuries or equally,
- A continued poor attendance record without reasonable motive.

Trafficking and slavery is most often discovered rather than an individual coming forward declaring they are a victim, particularly if they have been forced to undertake crimes. We believe many of our team members responsible for recruitment will be the first point of call in identifying whether individuals applying for positions within our organisation are being subjected to such exploitation.

Members of staff responsible for recruitment are reminded to be vigilant of the following:

- Individuals who approach any member of Project:interiors looking to befriend staff members and offer to find us workers, often at short notice
- A number of potential workers are introduced to our organisation (or member of our staff) by a particular individual, usually of the same nationality and with good English language skills. This individual may claim to be a friend or relative of the workers, or just helping out but speaks for the other individuals and controls the organisation S/he waits whilst the individuals are being interviewed
- Externally completed starter documents are in a significantly better standard of English than the applicant possesses
- A number of externally completed starter documents are brought in by one individual on behalf of his/her 'friends' or 'family' and the documents are completed in the same handwriting for the different applicants
- Applicants appear frightened, agitated or secretive and act as if they are instructed by another

If the individual responsible for recruiting potential candidates suspects any of the above points, they are to make a note of this and refer any concerns to the Managing Director. The Managing Director will provide the recruiter with additional guidance on the monitoring measures they should take, given the seriousness of the situation.

Members of staff are reminded that often there may be a simple explanation for any of the aforementioned points, for example, a fitter applying for a position may have a learning difficulty and therefore has had his or her partner complete the form on their behalf. Members of staff are required to use their own judgement in this situation and seek explanations for such behaviour, if this does not compromise the safety of our own staff and the potential individual subject to exploitation.

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Workplace

Our organisation carries out a wide variety of maintenance works in and around occupied properties and in particular student residential properties. All Project:interiors employees shall be made aware of our slavery and whistleblowing procedures and if they see or suspect such practices in and around the properties they are working in, the members of staff and / or subcontractors are required to report this to their line manager and/or client, as well as the Associations mentioned above.

Our procedures relating to human trafficking shall be communicated to the workforce in numerous ways. This may include, posters situated around our offices, through toolbox talks, through our Project:interiors staff core Training and through our management meetings.

All members of staff are required to be mindful of the following:

- A third-party calls to book in a friend or family member as available for a work shift
- Workers say they rent from a landlord, being the individual who recommended the new recruit starts within our company
- Workers are delivered in minibuses or people movers, particularly where such transport is not licensed and/or the driver is not part of the workforce
- One worker supplies food in the workplace for a number of workers
- Workers physical appearance may show signs of injury and malnourishment and their general appearance may be unkempt with inappropriate clothing
- A rise in the number of non-English speaking workers, particularly of a certain nationality
- A particular worker may stay close to a group of workers when anyone from authority is present
- A pattern where a group of workers stop working suddenly for no particular reason
- Checking addresses on starter forms with many members of staff living at the same address
- Checking bank account numbers, showing a number of unrelated workers paid into one bank account
- Checking mobile phone numbers and seeing there are a number of individuals with the same number on their starter form, similarly with next of kin details

At regular intervals throughout each year, we shall issue relevant leaflets/flyers along with payslips, encouraging any employee to speak up and report if they are a victim of such inhumane treatment.

We shall continue to work closely with our own staff and suppliers to ensure slave labour, exploitation is not occurring within any realm of our business or that of our supply chain.

Whistleblowing

If any individual or member of staff suspects slavery or mistreatment of any kind whether with an existing member of staff, supplier, subcontractor or any of their staff, they can report this anonymously to our external HR Department (helen@thepersonnelpartnership.co.uk), if they do not feel comfortable reporting this to one of the specified agencies.

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All members of staff are reminded of this procedures throughout the duration of their employment and this policy is issued to all members of staff once per year or, as and when it is updated.

Monitoring procedures

We may seek at an alternative time to provide workers or third parties with questionnaires, however, we understand that some of the questionnaires available are quite intrusive and many members of staff may not wish to disclose the information being requested, regardless of the situation they are in.

Investigation procedures

Members of staff reporting this to the authorities should be mindful that they should have sufficient reasoning to do so as if an investigation is started by the authorities and there isn't sufficient evidence, the worker may be subject to harm. Therefore, if a member of staff only has suspicions, these should be reported to our Managing Director, who will form a thorough investigation. Project Grout will open up an investigation file, detailing records of conversation relevant to the investigation; review information periodically; seek further guidance from the individual's supervisor or other team members who may have suspicions (findings will also be noted down and stored in the file). The member of staff suspected of being a victim of exploitation will be asked to come in and attend an interview; it will not be pre-disclosed that the meeting is relating to suspicions of exploitation until the individual actually arrives at the interview. No other person will be permitted into the room other than the working employee and the nominated person managing the case. Should the nominated person find exploitation to be occurring, this will be reported immediately to the authorities and the nominated person will submit copies of all documentation recorded from the investigation file.

Existing policies relevant to the Modern Slavery Act 2015

We have various procedures in place already within our organisation that will help uncover such practices. These include our commitment to the Human Rights Act and the Equality Act.

Within our organisation, when putting in place policies and procedures, we ensure all individual's rights are taken into account and the policies are written in such a way as to appeal to the individuals rather than our organisation, for example, our health and safety policy is in place to ensure all members of staff undertake their duties safely without causing harm to themselves or others.

When putting in place new policies and procedures, we ask members of staff for their input into new policies.

Article 2 – Right to Life

All members of staff are treated fairly and our health and safety policies and training ensure all members of staff are properly protected in the course of their duties and individuals affected by our works are also provided with safety precautions to ensure our work does not impede any health and safety protocol which could result in the loss of life.

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Article 3 – Prohibition of Torture

All members of staff are treated in a fair and humane manner and under no circumstances whatsoever will torture be founded within our organisation by any individual affected by our business activities or any member of staff working within the organisation. Should such allegations be made, a full investigation will take place and the appropriate authorities, such as police authorities and social services, child protection agents will be notified if any member of our staff suspects any form of torture throughout the course of their business activities. To this end, all members of our team are trained in the procedures surrounding child protection, safeguarding vulnerable people and any other such relevant procedures.

Article 4 – Prohibition of Slavery and Forced Labour

Employment is not forced or involuntary, team members are free to leave at any time after reasonable notice. Our policy hereby shall completely prohibit any; use of worker-paid recruitment fees for supply of labour, forced overtime or confiscation of personal identification.

Working conditions for all Project:interiors employees are clean and safe, potential hazards are identified by a competent Health, Safety, Environmental and Quality manager and other competent management and our Management ensures the wellbeing of all staff on site and within office premises. Prevention methods to mitigate hazards are implemented throughout our organisation and are scrutinised and subsequently update or improved on a regular basis.

There is not and shall not be any recruitment of child labour. Young persons, working within Project:interiors include only trainees and apprentices, whom have registered under a CITB training scheme through one of our recruitment workshops or through our voluntary work placement scheme. Anyone under the age of 18 working within our organisation shall not undertake work which is likely to be hazardous or interferes with the young person’s education, or has a detrimental effect to the person’s physical, mental, spiritual, moral or social development. All young persons within Project:interiors never undertake lone working and always work in strict adherence to our buddy system, which complies with all of the relevant employment law regulations set out by the UK and EU governing authorities.

Article 5 – Right to Liberty and Security

Under the Human Rights Act 1998, no individual shall be deprived of his or her liberty. Project:interiors pledges that we will not hold any persons under our employment against their will whether this be associated with their position or otherwise. We would never confiscate personal ID of any employees. Employees are not forced to join Trade Unions, however, our current pay scale for site-based operatives is based on the CIJC working rule agreement, which is produced by the Unite and GMB unions. Our HR policies and procedures allow for representation from unions if requested.

Article 6 – Right to a Fair Trial

Should any member of staff find themselves subject to employment termination, a proper and lawful reason will be presented. We fully understand our legal and moral obligations under employment law and therefore members of staff are issued with employment policies. Serious breaches of such policies will result in disciplinary actions and in this instance, we have grievance and appeal procedures in place to resolve any such issues before resulting in termination of employment. Should any member of staff feel they have case for tribunal or otherwise, our organisation will take reasonable and fair steps to

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ensure a fair trial is achieved for all parties. If a member of staff is prosecuted under UK law by a governing body, such as the HSE, Project:interiors will take the appropriate steps to support any individual in such instances, and whatever steps have to be taken will be deemed appropriate by a proper and competent legal counsel.

Article 7 – No Punishment without Law

As mentioned in Article 6, our organisation will take reasonable steps and ensure all actions taken on behalf of or by the company will be done so in a fair manner. Generally, as our organisation is not a public body, we do not have the right to punish an individual at all, therefore any such action resulting in punishment will be taken by the appropriate court, governed by UK legislation and procedures.

Article 8 – Right to Respect for Private and Family Life

All individuals have the right to receive respect for their private and family life, their home and their correspondence. This enables all individuals the right to live their own lives with such personal privacy as is reasonable in a democratic society, taking into account the rights and freedoms of others. For example, freedom to choose sexual identity; freedom to choose appearance and dress and freedom from intrusion by the media.

In addition, the right to a private life can also include the right to have information about themselves kept private; in the instance of our organisation such sensitive information can include Bank records, DBS and other security checks, photographs, medical information and any other such information. Project:interiors operates a Data Protection Policy, which can be attained from any Project:interiors, which sets out our Data Protection procedures in full.

Article 9 – Freedom of Thought, Conscience and Religion

All individuals hold the right to believe in a wide range of views, opinions, religions, thoughts, faith and any other beliefs including position of conscience. All individuals also hold the right to practise or demonstrate such belief or religion and as an organisation, individuals who do not celebrate Christmas and celebrate other holidays instead, e.g. Diwali, will not be refused time off during those festivals. In addition, individuals who require prayer five times a day, we shall provide a facility within the individual's place of work to enable them to carry out any activity which is associated with their belief, within reason. In addition, we have various equality and diversity procedures and policies in place to ensure compliance with the Equality Act 2010 and to ensure discrimination is eliminated throughout the organisation. These policies and procedures are available upon request from Project:interiors Head office.

Article 10 – Freedom of Expression

As long as any action or expression by a member of staff is not found heinous, insulting, discriminatory or inappropriate to any other member of staff, resident, member of the public, client resident or any other stakeholders, members of staff are encouraged to express their opinions and views singly or in dialogue.

Article 11 – Freedom of Assembly and Association

This section details all individuals having the right of peaceful assembly and includes individual rights to protest in a peaceful way, providing that individual does not act wrongfully and does not commit any act, or threat of violence. Individuals also hold the right to not take part, if they choose not to. As an

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employer, we ask for proper consultation from members of staff who wish to take part in a protest to ensure the organisation can successfully carry out the day’s duties without posing a business risk.

Article 12 – Right to Marry

Our organisation does not discriminate: To this end, we ensure all members of staff are treated fairly and ensure they are entitled with the appropriate and legal amount of annual leave to allow them to take holiday or organise weddings etc. As with article 8, all persons associated with our organisation are entitled to private lives where they can choose to do whatever they wish (whilst complying with UK law). To this end we will not stop any individual from carrying out any personal activity and neither is it Project:interiors’, nor any other person’s, business what any Project:interiors employee does in their personal life.

Article 14 – Prohibition of Discrimination

Our organisation is committed to promoting equal opportunities throughout the industry, to ensure compliance with all legislation associated with mitigating discrimination. Our Human Resources Manager and Health, Safety, Environmental & Quality Manager are responsible for the review and implementation of all equality and diversity procedures throughout Project:interiors. Our Company Equality and Diversity policy and procedures are working documents which are under constant review. These documents are issued to all members of staff and associated stakeholders in our induction packs upon commencement of employment or start of their involvement with our organisation. All documents are made available to all associated parties and employees from office notice boards, website, via post and through resident notification and consultation, through competitive tendering procedures (prior to the commencement of award of works) and through regular training. We use these documents as a guidance to manage the way in which we recruit, retain and provide career progression to all members of our team.

Article 17 – Prohibition of Abuse of Rights

Under no circumstances will our organisation abuse any individual’s rights and we pledge to do everything in our capacity to rid our industry of modern slavery and the abuse of any people’s rights who may come in to contact with our Organisation.

Project:interiors’ commitment to ensure full compliance with the above articles of The Modern Slavery Act 2015 and with the Human Rights Act 1998, shall include our assurance that regular monitoring of these procedures is undertaken by senior management of the Company. We also pledge to spread awareness of the potential signs of modern slavery amongst our employees and we will support and provide solutions to help such individuals escape their traumatic situation to find justice for these victims.

Further Guidance

Are you being forced to work when you don’t want to?

Do you have to pay someone money to give you work?

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Are you being forced to live in accommodation against your will?

Is someone controlling your identity documents or bank account?

Is someone threatening or intimidating you or your family?

If you answer YES to any of these questions, tell a trusted manager, worker representative and:

Report it to the Gangmasters Licensing Authority on 0800 432 0804 or Modern Slavery Helpline on 0800 0121 700 or at [https:// modernslavery.co.uk/contact.html](https://modernslavery.co.uk/contact.html).

Call the Police in an emergency on 999, or 101 if it is not urgent.

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