

# Slavery and Human Trafficking Policy

## Policy & Principles

This policy applies to all areas and operations of the policy of Swift Brickwork Contractors Limited whose principal operations are undertaken within the construction industry for various commercial and domestic clients.

Swift Brickwork Contractors Limited (SBCL) acknowledges the provisions of the Modern Slavery Act 2015 and will ensure transparency within its organisation and with supplying and servicing in this industry. The Company is satisfied from its own due diligence there is no evidence of any act of modern-day slavery or human trafficking within its own organisation.

As part of the company's due diligence process into slavery and human trafficking as a supplier approval processes incorporates a review of the controls undertaken by the supplier. We do not enrol outside of the UK and EU. The level of management control required for these sources will be continually monitored.

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

SBCL will undertake responsibility for implementing this Policy Statement and its objectives.

The Policy Statement will be reviewed and re-published annually.

## Modern Slavery Policy

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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

As part of our contracting processes, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

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

## Slavery and Human Trafficking Policy Continued

### Compliance with the Policy

**You must ensure that you read, understand & comply with this policy.**

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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.

You must notify your manager or the HR or Legal Department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the HR or Legal Department.

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. 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 part of our supply chain.

If you believe that you have suffered any such treatment, you should inform your manager immediately.

### Communication

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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

M Walsh  
Managing Director