



## POLICY: SMS505 Anti-Slavery & Human Trafficking

REVISION RECORD				
REV	DATE	DESCRIPTION OF REVISION	PREPARED BY	AUTHORISED BY
H	04-10-2024	Full review and template update	Andy Oakes	Shaun Tolfree
I	01-04-2025	Addition of section following gov.uk MSAT	Alexa Stewart	Shaun Tolfree

### POLICY STATEMENT

Sanctus Limited carry out Contaminated Land Remediation & Environmental Enhancement within the Construction Industry. Sanctus recognises 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. Sanctus Ltd. 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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Sanctus are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, whether services or products supplied in our office or on site, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, 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.

Evidence of compliance with Modern Slavery Legislation is requested from all subcontractors/suppliers through our QES Questionnaire prior to addition to our Approved Suppliers List.

This Policy applies to all company staff at all levels, contractors, agency workers, volunteers, interns and individuals working in any capacity for or on behalf of Sanctus Ltd.

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



The Sanctus company handbook confirms freedom of employee's movements and decisions. Sanctus anti-bullying and harassment policy also prohibits the use or threat of violence, harassment and intimidation for any reason.

Sanctus will never insist on worker-paid recruitment fees, compulsory overtime or confiscation of workers original identification documents.

### **Responsibilities**

The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. To include ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged.

### **Compliance with the Policy**

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

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.

You must notify your manager 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 or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. Specific attention should be paid with regards to agency labour utilised during site works, as this is an area where risk is highest.

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 chains constitutes any of the various forms of modern slavery, raise it with your manager.

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 of our supply chains. 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



inform HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

### **Communication & Awareness of this Policy**

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.

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. Any supplier/subcontractor found to be in breach of current Modern Slavery legislation will be immediately removed from the Sanctus Approved Suppliers List.

Reviewed & Signed, for and on behalf of  
Sanctus Ltd:

A handwritten signature in blue ink, appearing to read "Shaun Tolfree".

Shaun Tolfree – 01/04/2025