

# MODERN SLAVERY POLICY



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## DOCUMENT CONTROL & REVISION

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# **1 MODERN SLAVERY POLICY**

## **1.1 INTRODUCTION**

The Company is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and impose the same standards on its suppliers.

SF-Stefan do not tolerate any kind of forced labour, child labour or exploitation. Our intention is to encourage awareness of the issues around modern slavery and ensure early identification of issues or concerns of human trafficking and forced labour, in line with the guidance set out in the Modern Slavery Act 2015.

SF-Stefan has registered on [www.stronger2gether.org](http://www.stronger2gether.org) to utilise guidance, tools and resources, and to ensure we are kept up to date with best practice and legislation.

SF-Stefan's Modern Slavery Statement has been published in accordance with section 54 (1) of the Modern Slavery Act 2015 and is reviewed annually. It sets out the steps taken by The Company during each financial year ending 5th April to prevent slavery, forced labour and human trafficking from taking place in any part of our own business operations, or that of our supply chain. SF-Stefan's policy and procedures / practices are also reviewed annually to consider whether we need to make any changes to our policy or practices, check we are meeting our obligations and to set out any actions we intend to take in the year ahead to ensure we continue to meet our obligations.

## **1.2 RESPONSIBILITY**

We have appointed the managing and commercial directors to have responsibility for the human rights, ethical trade and corporate social responsibilities of the business including an explicit responsibility for preventing modern slavery. The name of this person will be made available to relevant stakeholders as required / appropriate. We will also ensure that at each operational site / contract location that a site manager has responsibility for implementing process and procedures for tackling hidden labour exploitation.

## **1.3 ORGANISATION STRUCTURE & SUPPLY CHAINS**

SF-Stefan work across both public and private sectors to deliver high quality external works and hard landscaping, as well as highway and civil engineering projects. The Company carries out work either as a principal contractor working directly for a client, or as a first-tier contractor under a principal contractor. SF-Stefan employ a number of its workforce directly, but also use regular contract labour and will subcontract work packages to other companies where applicable. Our subcontractors supply their own labour to work for SF-Stefan.

- SF-Stefan has a diverse workforce and therefore employs people from a number of different countries to work on our construction sites, both directly and through our subcontractors and employment agencies. There is a risk that some foreign labour could have been trafficked. It is within SF-Stefan's company policy to check the identity and right to work of all of our directly employed staff, in line with the Company's Right to Work Procedure It is also stated within this policy that all subcontractors and employment agencies are to conduct their own checks, in accordance with the Immigration Asylum and Nationality Act 2006.

In addition, SF-Stefan's supply chain also consists of our suppliers of goods, services, and materials. The majority of the materials used in our operations are procured by the Company. Where possible, there is a preference to source materials from within the United Kingdom. However, this is not always possible due to commercial availability. For this reason, SF-Stefan's supply chain includes some countries where there is a greater risk of modern slavery issues and child labour. In order to mitigate

against this risk, SF-Stefan only use an approved list of suppliers with an identifiable and distinct legitimate business entity.

#### **1.4 MODERN SLAVERY IN COLLABORATION WITH OTHER POLICIES**

This policy and our Modern Slavery Statement operate in conjunction with SF-Stefan's policies on Code of Conduct, Anti-Bribery, Equal Opportunities, Dignity at Work, Grievance Procedure, Whistleblowing, Right to Work Procedure and our Ethical Policy. These policies are designed to ensure that SF-Stefan is acting ethically and with integrity in the way that we operate as a business. Our policies frame SF-Stefan's standards and ethics, helping to ensure that unlawful discrimination or business practices are avoided. To ensure their effectiveness, SF-Stefan's policies are accessible and

#### **1.5 REPORTING & RECORDING SUSPECTED CASES OF LABOUR TRAFFICKING, FORCED LABOUR & OTHER HIDDEN LABOUR EXPLOITATION**

Should an employee have concerns about a colleague / fellow employee being involved in, or a victim of, labour trafficking, forced labour or other hidden third party labour exploitation, they should in line with the organisation's Whistleblowing Policy, in the first instance report the matter to their line manager, or a director if they have concerns that their line manager may be involved. The line manager will work with the managing director to consider / investigate the matter. The Whistleblowing Policy sets out fully how to report a matter and what to do if an employee does not feel that their concerns are being investigated / considered appropriately.

The reporting of such concerns is a serious matter and will be investigated formally and resolved. Where necessary SF-Stefan will consider using independent interpreters to carry out investigation interviews or complaint interviews to ensure matters are accurately reported, recorded, and fully understood.

SF-Stefan will adopt a proactive approach to reporting suspicions of hidden worker exploitation to the relevant bodies. A Director will be responsible for the reporting any concerns or suspicions raised within the organisation of the potential presence of forced labour and / or labour exploitation.

#### **1.6 DUE DILIGENCE PROCESSES & OUR EFFECTIVENESS**

SF-Stefan's Modern Slavery Statement which is reviewed annually sets out the Company's actions it has taken in the previous year in order to minimise this risk of modern slavery in the supply chain and sets out SF-Stefan's training plans and commitments for the year ahead.

#### **1.7 TRAINING**

SF-Stefan's induction training for new workers includes the provision of training on how to recognise and report forced labour, labour trafficking and other third party hidden party labour exploitation which includes access to the "Stronger Together" leaflet which raises awareness and gives guidance for employees on how to spot the signs that might indicate potential exploitation.

The Company reviews the requirement for refresher training or awareness campaigns on an annual basis.

## 1.8 REVIEW

SF-Stefan's policy and procedures / practices are reviewed annually to consider whether we need to make any changes to our policy or practices, check we are meeting our obligations and to set out any actions we intend to take in the year ahead to ensure we continue to meet our obligations.

This policy will be regularly reviewed, and we will ensure routine audits are carried out to check that practices in place to identify, deter and tackle hidden labour exploitation is being consistently applied throughout our business. If the Company's perception of risk changes, existing practices will be revisited.



Stefan Voloseniuc  
Managing Director  
1<sup>st</sup> October 2020