

Modern Slavery Statement and Policy

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This statement explains the steps that Agetur UK have taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business. This document sets out the policy of AGETUR UK with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Modern Slavery Act 2015.

Agetur UK's Managing Director, HR Advisor and HSE Manager are responsible for ensuring that the statement is published and reviewed on an annual basis.

This statement relates to the financial year from 1st March 2024 to 1st March 2025

Structure of the organisation

AGETUR UK has of approximately 150 employees/agency workers/subcontractors working wholly in the UK. The business is one of the leading civil engineering companies in the Thames Valley region. Agetur UK specialises in the construction of roads, sewers, and civil engineering works. The demands for our services is consistent throughout the year and is therefore not seasonal. Work is carried out in the Thames Valley Region.

Our policy

Agetur UK has a zero-tolerance approach to modern slavery. It is 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 within our Company or those of its suppliers.

Agetur UK does not enter into business with another organisation in the UK or abroad which knowingly supports or is found to involve slavery, servitude or compulsory labour.

No labour provided to Agetur UK to carry out its business is obtained by means of slavery or human trafficking.

Policy Enforcement

This policy has been issued throughout the business and has been incorporated into our terms of business with our suppliers. This policy is designed to comply with the Modern Slavery Act 2015.

Agetur UK is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Agetur UK expects the same high standards from all of its contractors, suppliers and other business partners.

Agetur UK is evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Agetur UK expects its suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with the Company's procedures to help in the identification and prevention of modern slavery and to conduct business in a

manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

Whilst recognising that Agetur UK's statutory obligation to set out the steps it has taken to ensure that modern slavery and human trafficking is not taking place in its supply chains, Agetur UK acknowledges that it does not control the conduct of individuals and organisations in its supply chains. To underpin its compliance with practical steps, Agetur UK has implemented the following measures:

- Engage with the Company's current suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- Suppliers, consultants and subcontractors are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- Introduced contractual provisions for the Company's suppliers to confirm their adherence to this policy and accept the Company's right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Recruitment/Agency workers:

We use only specified, reputable employment agencies to source labour and verify the practices of any new agency it is using before accepting workers from that agency.

Our policy sets out the standard of equality, dignity and diversity expected of all employees. No employee should behave in a way which demeans or discriminates against fellow employees.

We operate only within the UK and the following principles apply to our business and suppliers:

- Child labour or labour from human trafficking must not be used.
- Any form of forced or compulsory labour must not be used.
- Workers must be free to leave employment or work after reasonable notice.
- Passports, visas or other personal documents will not be taken from workers.
- Workers should not be subject to contracts that require unrealistic repayment of loans, accommodation or other expenses that they have little chance to repay.
- Workers must not be dehumanised, treated as a commodity, or bought or sold as property.
- Workers must not be physically constrained or have restrictions placed on their freedom of movement.
- All remuneration must comply with relevant UK Employment laws relating to minimum wages, flexible working hours, Maternity/paternity leave, protection from redundancy, etc.
- Workers should have safe and healthy working conditions that comply with or exceed the standards set by the industry and local health and safety legislation.

Employee Training

The company's policy has been communicated to all current employees as part of their induction programme. We will require our suppliers, consultants and subcontractors to adhere to this policy as a minimum.

Our policy sets out the standard of equality, dignity and diversity expected of all employees. No employee should behave in a way which demeans or discriminates against fellow employees.

Potential exposure

Agetur UK considers its exposure to slavery and/or human trafficking to be relatively limited.

Monitoring and review process

Agetur UK is developing the right long-term monitoring measures for suppliers and employees.

Agetur has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Agetur UK will review and publish an anti-slavery statement annually, setting out our approach to human trafficking and slavery.

The Managing Director, HR Advisor and HSE Manager will be responsible for the review and administration of this policy.

Reporting concerns

We encourage all of our workers, customers and other business partners to report any concerns related to the direct activities, or our supply chain. Workers are encouraged to make disclosures, in confidence, without fear of retaliation.

Suspensions of modern slavery can be reported to the Managing Director or HR Advisor or Health & Safety Manager. Guidance on suspected slavery can be found at the Home Office website: www.modernslavery.co.uk. **The Modern Slavery Helpline number is 08000 121 700.**

Additional action points

Agetur UK is also committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure.
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage, have the right to work in the UK and comply with the UK employment laws.
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of our suppliers and sub-contractors also operate in accordance with the Act.
- Appointing the HR and HSE Manager to oversee the compliance with the Modern Slavery Act 2015.

- Identifying and addressing any areas of high risk in our supply chain.
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

This statement has been approved by the Company's board of directors, who will review and update it annually.

Managing Director's Signature:



Mr. Stuart Green

Date: 23 April 2024