

<b>Policy:</b>	The Modern Slavery Act 2015	<b>Review Period:</b>	Annual	<b>Issued:</b>	23/08/2019
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**Policy: The Modern Slavery Act 2015**

**INTRODUCTION FROM THE CEO**

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our employees are expected to report concerns and management are expected to act upon them. Mabey Bridge is proud of the integrity measures it takes in this regard.

**OUR BUSINESS**

Mabey Bridge is an international provider of high quality bridging and infrastructure solutions that specialises in rapid-build, pre-engineered modular bridging solutions to develop improve and repair essential infrastructure in urban and rural areas. Mabey Bridge delivers permanent and temporary solutions for transport, military, oil and gas, and mining applications, as well as for humanitarian emergencies and disaster relief.

**OUR SUPPLY CHAINS**

Our supply chains include the sourcing of raw materials and goods & services principally related to the provision for the manufacture of modular bridging.

**OUR POLICIES ON SLAVERY AND HUMAN TRAFFICING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

**DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICING**

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with our suppliers and customers and make clear our expectations of business behaviour - Supplier Quality Assurance Policy (**MBP008-03**)
- With regards to national or international supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all suppliers.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers - Reporting Concerns and Whistleblowing (**I01-ETH-27**)

**SUPPLIER ADHERENCE TO OUR VALUES**

Mabey Bridge maintains written policies that strictly prohibit the use of slavery or human trafficking in its direct supply chain. These include our Ethics and Conduct Policy (**MBP067**) in which we communicate our ethical principles and associated expectations to our supply chain. We have a zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. Management are responsible for compliance in their respective departments and for their supplier relationships.

**TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff. All Directors have been briefed on the subject.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by qualified members of staff
- Use of labour monitoring and payroll systems
- Communication and personal contact with our suppliers within the supply chain and verified understanding of, and compliance with, our expectations.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our companies slavery and human trafficking statement.

A handwritten signature in black ink, appearing to read 'Michael Treacy'.

Michael Treacy  
CEO Mabey Bridge  
21/02/2018

## **1 Introduction**

- 1.1 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 depriving an individual of their freedom for personal or commercial gain by a third party. Mabey Bridge has 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.
- 1.2 We are also 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. 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 contractors, suppliers and business partners will hold their own suppliers to the same high standards.

## **2 Purpose and scope**

- 2.1 This policy sets out Mabey Bridge's zero tolerance position to modern slavery. All members of staff must comply with this policy and, where appropriate, ensure that it is brought to the attention of suppliers, contractors and business partners.
- 2.2 This policy does not form part of any employee's contract of employment. It may be amended at any time and we may depart from it depending on the circumstances of any case. This policy applies to all individuals working for the Company, including but not limited to officers, directors, managers, employees, consultants, contractors, trainees, interns, placement students, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as staff in this policy).
- 2.3 Any third parties who have access to our systems are also required to comply with this policy.

## **3 Breaches of this policy**

- 3.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with the company's disciplinary policy and procedure. Serious breaches may amount to gross misconduct resulting in dismissal. If appropriate, information may be handed to the police in connection with a criminal investigation.
- 3.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **4 Roles and responsibilities**

- 4.1 The Board of Directors of Mabey Bridge has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The Executive Management Team of Mabey Bridge has primary and day-to-day responsibility for implementing this policy and in conjunction with the Compliance Manager 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.
- 4.3 Management at all levels are responsible for 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.
- 4.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your line manager.

## **5 Compliance with this policy**

- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 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.
- 5.3 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.
- 5.4 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.
- 5.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 5.6 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 contravenes this policy, raise it with your manager.
- 5.7 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 the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **6 Communication awareness and training**

- 6.1 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.
- 6.2 Senior management are responsible for ensuring, that all staff receive the appropriate level of training.
- 6.3 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners as appropriate at the outset of our business relationship with them and reinforced as appropriate thereafter.

**END**