MODERN SLAVERY POLICY

Policy Statement

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 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 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, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners. This policy does not form part of any employee's contract of employment, we may amend it at any time.

Responsibility for the Policy

The Procurement Department has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Directors have a day-to-day responsibility 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. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

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 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 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 Procurement 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 and Awareness of Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. 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 the 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.

Right to Work in the UK

The prevention of illegal migrant working in the UK is governed by sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006. An employee will need to provide:

One document from List A, these documents show an on-going RTW in the UK.
If they cannot produce a document from **List A** then relevant document(s) from **List B** must be produced. These documents show a RTW in the UK for up to twelve months. These must be original copies, photocopies: scanned documents and faxes for example are not acceptable. Proof of RTW in the UK must be provided when application is made in respect of new applicants. In respect of renewal applicants' proof should be provided on application also, but if proof cannot be provided at that time the Council will allow application to be made, but no licence will be granted until proof has been provided.

A copy of the relevant page(s) of the documents provided will be retained in a format which cannot subsequently be altered, for example a photocopy or a scanned document. In the case of a passport or other travel document, the following parts must be photocopied or scanned. The document's front cover and any page containing the holder's personal details. Any page will be copied that provides details of nationality, his or her photograph, date of birth, signature date of expiry or biometric details, and Any page containing UK Government endorsements indicating that the holder has an entitlement to be in the UK and is entitled to undertake the work in question.

Other documents will be copied in their entirety. Any documents will be kept securely for the duration of the licence and for a further two years after the expiry of the last licence if renewal is not sought.
This is in line with legislation which requires employers to retain copies of documents relating to individuals they have employed. If further verification is required, this will be specified in a letter detailing the exact requirements.

Reporting of Illegal Workers to the Relevant Authorities

If James King (Plant) Limited has any concerns that an employee has been working in the UK illegally then this information will be reported to the Home Office, Border and Immigration Agency and UK Border Agency.

Documents to Establish Eligibility to work in the UK

If the applicant can produce a satisfactory document from List A, eligibility to work in the UK will have been established and will not need to be checked again. If an application is made after a licence has expired, then proof of a person's RTW in the UK will be required again.

LIST A

- A current valid passport showing that the holder is a British citizen or a citizen of the United Kingdom and Colonies and contains the words 'the holder has the right of abode in the United Kingdom.'
- A passport or national identity card showing that the holder is a national of a European Economic Area (EEA) country or Switzerland.
- A residence permit or registration document certifying or indicating permanent residence issued by the Home Office or the UK Border Agency to the national of an EEA. For nationals of EEA counties, this document consists of a blue permit carrying a photograph and personal details of the holder. Swiss nationals receive a similar document in the form of a pink residence permit.
- A permanent residence card issued by the Home Office or the UK Border agency to the family member of a national of an EEA country or Switzerland. When nationals from countries and Switzerland. When nationals from EEA or Switzerland reside in the UK their immediate family members from outside the UK, may gain the same rights to enter or remain here and work in the freely. However, the EEA national in question must be lawfully residing here in the UK for their family member to have and maintain these rights.
- A Biometric Immigration Document issued by the UK Border Agency to the holder, which indicates that the person named in it is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK. Further information will be made available by the UK Border Agency when the Biometric Immigration Document is due to be issued.
- A passport or other travel document endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK or has not time limit on their stay in the UK.
- An immigration Status Document issued by the Home Office, Border and Immigration Agency or UK Border Agency to the holder with an endorsement indicating that the person name in it is allowed to stay indefinitely in the United Kingdom or has no time limit on their stay in the United Kingdom, when produced in combination with an official document giving the person's permanent National Insurance Number and their name issued by a Government agency or previous employer.
- A full birth certificate issued in the UK, Channel Island, the Isle of Man or Ireland which includes the name(s) of at least one of the holders' parents, when produced in combination with an official document giving the persons permanent National Insurance Number and their name issued by a government agency or previous employer.
- A full adoption certificate issued in the UK, Channel Island, the Isle of Man or Ireland which includes the name(s) of at least one of the holders' adoptive parents when produced in combination with an official document giving the persons permanent National Insurance Number and their name issued by a government agency or previous employer.
- A certificate of registration or naturalisation as a British citizen, when produced in combination with an official document giving the persons permanent National Insurance Number and their name issued by a government agency or a previous employer.
- A letter issued by the Home Office, Border and Immigration Agency or UK Border Agency to the holder which indicates that the person named in it is allowed to stay indefinitely in the United Kingdom when produced in combination with an office document giving the persons permanent National Insurance Number and their name issued by a government agency or a previous employer.

If an applicant produces any document from List B then the document must be re-verified, at least every 12 months, to produce evidence of the eligibility to work in the UK.

List B

- A passport or other travel document endorsed to show that the holder is allowed to stay in the United Kingdom and is allowed to do the type of work in question, provided that it does not require the issue of a work permit.
- A Biometric Immigration Document, issued by the UK Border Agency to the holder which indicates that the person named in it can stay in the United Kingdom and is allowed to do the work in question.
- A work permit or other approval to take employment issued by the Home Office, Border and Immigration Agency or the UK Border Agency, when produced in combination with either a passport or another travel document endorsed to show that the holder is allowed to stay in the United Kingdom and is allowed to do the work in question, or a letter issued by the Home Office, Border and Immigration Agency or the UK Border Agency to the holder, or the employer or prospective employer confirming the same.
- A certificate of application issued by the Home Office, Border and Immigration Agency or the UK Border Agency to or for a family member of a national of an EEA country or Switzerland, stating that the holder is permitted to take employment, which is less than 6 months old, when produced in combination with evidence of verification by the UK Border Agency Employer Checking Service.
- A residence card or document issued by the Home Office, Border and Immigration Agency or the UK Border Agency to a family member of a national of an EEA country or Switzerland.
- An Application Registration Card (ARC) issued by the Home Office, Border and Immigration Agency or the UK Border Agency stating that the holder is permitted to take employment, when produced in combination with evidence of verification by the UK Border Agency Employer Checking Service.
- An Immigration Status Document issued by the Home Office, Border and Immigration Agency or the UK Border Agency to the holder with an endorsement indicating that the person named in it can stay in the United Kingdom, and is allowed to do the work in question, when produced in combination with an official document giving the person's permanent National Insurance Number and their name issued by a Government agency or previous employer (e.g. P45, P60, National Insurance Card).
- A letter issued by the Home Office or the UK Border Agency to the holder or the employer or prospective employer, which indicates that the person named in it can stay in the United Kingdom and is allowed to do the work in question, when produced in combination with an official document giving the person's permanent National Insurance Number and their name issued by a Government agency or previous employer (e.g. P45, P60, National Insurance Card).

Name: SAM KING
Position: Managing Director

Signed: **Dated: 30th May 2025**