


MODERN-DAY SLAVERY AND HUMAN TRAFFICKING POLICY

Forest Environmental Limited (FEL) Unit 10 – 13 Urban Hive, Theydon Road, Upper Clapton, London, E5 9BQ



Policy Owner:	Glenn Tutty	Signed:		Last Reviewed:	February 2017
Position:	HSQE Director	Date:	14 th February 2017	Review Frequency:	Annual
				Next Review:	February 2018

1.0 Introduction

This Modern-Day Slavery and Human Trafficking Policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Forest Environmental Limited's (FEL) slavery and human trafficking statement for the current financial year.

This Modern-Day Slavery and Human Trafficking Policy applies to all of FEL's operations both at the regional offices and on transient work sites.

The FEL Board of Directors recognises and accepts responsibility to ensure that there is no slavery or human trafficking in our supply chains or in any part of our business. This Modern-Day Slavery and Human Trafficking 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. By signing this Modern-Day Slavery and Human Trafficking Policy, the HSQE Director gives the Board's approval.

FEL recognises that Modern-Day slavery and human trafficking remains a hidden blight on our global society and that the company has a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This Modern-Day Slavery and Human Trafficking Policy is evaluated as part of the overall review of the FEL Integrated Management System to ensure its stated objectives are met.

2.0 Principles

The objectives and principles of the Policy are:

- Where possible FEL will build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- In relation to national supply chains, FEL will ensure that the point of contact is with a UK company or branch and will expect these entities to have suitable anti-slavery and human trafficking policies and processes. FEL will expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for FEL (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- FEL will ensure systems are in place to encourage the reporting of concerns and the protection of whistle blowers.
- FEL will maintain a zero tolerance to slavery and human trafficking and expect all those in the supply chain and contractors to comply with our values.
- FEL will ensure an understanding of the risks of Modern-Day slavery and human trafficking in our supply chains and our business by providing training/briefings to relevant members of staff from Director level down.

FEL will 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 by the following means:

- Use of labour monitoring and payroll systems to check eligibility of employees in the UK;

MODERN-DAY SLAVERY AND HUMAN TRAFFICKING POLICY

Forest Environmental Limited (FEL) Unit 10 – 13 Urban Hive, Theydon Road, Upper Clapton, London, E5 9BQ



- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations; and
- Where appropriate, completion of premises audits by an HSQE Manager and the Human Resource Manager.

3.0 Responsibility

The FEL Board of Directors, represented by the HSQE Director, have the joint overall responsibility for this policy including formulation, development, implementation and encouraging commitment by personnel at all levels of the Company.

The Management Representatives nominated in the Integrated Management System Manual are responsible for the co-ordination, implementation and monitoring of the policy throughout the organisation.

All employees, contractors and visitors are responsible for policy implementation by cooperating, participating and contributing to its success through their actions and suggestions. Staff are expected to report concerns and Management are expected to act upon them.

4.0 Communication

This Modern-Day Slavery and Human Trafficking Policy is communicated to all employees, contractors and visitors. A copy is published on the internal SharePoint Forest Environmental Limited Team Site. All employees are encouraged to read it and communicate any queries to a Director.

Copies are made available to interested parties on request and a copy is published on the company website.