



# Heritage Clay Tiles Ltd

Yesterdays Traditions Today's Choices Tomorrows Heritage

## MODERN SLAVERY POLICY

### Policy Statement

This policy statement sets out the Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Modern slavery is a crime resulting in an abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

## **Responsibility for the Policy**

The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

## **Compliance**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, is the responsibility of all those working for the Company or under the Company's control. Employees are required to avoid any activity that might lead to a breach of this policy.

If anyone believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with the Company's [Whistleblowers Policy](#). Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

If anyone is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, again it should be immediately raised. Matters can also be raised by contacting the government's Modern Slavery Helpline on 0800 0121 700, who are able to provide further information and guidance on modern slavery.

The Company aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains. The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

## **Breach of the Policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to be involved in modern slavery.