



MODERN SLAVERY AND HUMAN TRAFFICKING CODE OF CONDUCT

1. SCOPE AND BACKGROUND

- 1.1 This code of conduct applies to the supply of goods or services to Salford Van Hire Ltd (SVH) or its Parent Undertakings, its Subsidiary Undertakings and the Subsidiary Undertakings of any of its Parent Undertakings from time to time ("Parent Undertaking" and "Subsidiary Undertaking" having the meanings set out in section 1162 Companies Act 2006).
- 1.2 Not only do we ensure that modern slavery is not taking place within our own organisation, we also work to ensure it is not occurring within our supply chains.
- 1.3 It is a condition of all contractor, customer, supply and vendor contracts entered into with SVH that the principles set out in this Code of Conduct are adhered to.
- 1.4 As a basic principle, all contractor, customer, supply and vendors must comply with all applicable laws, including but not limited to employment, human rights, the environment and health and safety.

2. WHAT IS MODERN SLAVERY?

- 2.1 Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. Modern slavery would include:
 - 2.1.1 Individuals who are forced to work through mental or physical threat
 - 2.1.2 Individuals who have been dehumanised, treated as a commodity or bought or sold as property
 - 2.1.3 Individuals who are physically constrained or has restrictions placed on his or her freedom
- 2.2 SVH strictly prohibits the use of modern slavery and human trafficking in its operations and supply chain.
- 2.3 To ensure that we maintain the highest standard of business ethics and integrity, we are wholly compliant with the Modern Slavery Act 2015 ("the Act") and all other applicable modern slavery and human trafficking laws. As a result of our ongoing compliance, we require that all third parties, including suppliers and associates, with whom we have any dealings, are also working in accordance with the Act.
- 2.4 SVH is therefore committed to:
 - 2.4.1 upholding all relevant laws which counter human trafficking and modern slavery;
 - 2.4.2 educating our staff to know our principles and standards;
 - 2.4.3 avoiding working with others who do not share our values or who may harm our reputation.
- 2.5 Our expectation, within SVH, is to implement a zero tolerance stance in respect of modern slavery human trafficking. Breaches of the Act, this Code of Conduct or our Modern Slavery and Human Trafficking Policy may result in immediate termination of the relevant contract. We may also report any such incidents to the appropriate authorities for investigation.

3. FORCED LABOUR

- 3.1 SVH's aim is to promote the highest standards possible to eliminate the risk of all types of modern slavery and trafficking, including child labour. Workers shall not be subject to forced,

prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily. Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with local laws, and without the imposition of any improper penalties. Workers shall not be mentally or physically coerced to provide their labour.

4. CONFISCATION OF DOCUMENTS

4.1 Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.

5. CHARGING FEES OR DEPOSITS TO WORKERS

5.1 Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.

6. TERMS OF EMPLOYMENT

6.1 The aim shall always be to offer secure, regular employment to workers and to avoid the use of unstable, zero-hours and short term or casual work arrangements. Apprenticeships shall only be used where there is a genuine intent to provide the worker with skills and knowledge.

6.2 Workers shall have the terms of their employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be honoured by the employer and shall meet industry standards and the minimum requirements of local laws where the work is carried out. In particular:

6.2.1 **PAY:** Workers shall be paid an overall compensation package (taking into account wages, overtime pay, benefits in kind etc.) that meet or exceed the minimum requirements of the applicable laws. Workers shall be paid directly and regularly for the work they have carried out. Payments to workers shall not be withheld or delayed in breach of local laws (whether or not as a means of disciplining or controlling the worker). The arrangements for work and pay must be clear and transparent to workers so that they understand what they shall be entitled to in return for their labour. Advances and deductions from pay shall not be made where they breach local laws and the overall administration of pay shall not be such that workplace slavery is created.

6.2.2 **WORKING HOURS:** Workers shall not be required to work hours (including overtime) that are longer than reasonable and permitted in compliance with local laws. A worker shall be free to accept or reject any request that they work time in excess of the normal hours set out in the employment agreement and shall not come under threat of any detriment, penalty or sanction for not accepting overtime. A requirement to work overtime shall not be imposed on a worker as a penalty or disciplinary sanction.

6.2.3 **REST BREAKS:** Workers shall be given rest breaks (i) during the course of working hours, (ii) between shifts or periods of work and (iii) during the course of the week which are appropriate to the particular physical and mental demands of the duties carried out and the health and safety of the worker. At least one day off should normally be given to workers in each 7 day period.

6.2.4 **HOLIDAY :** Workers shall be given paid holiday entitlements which as a minimum shall meet or exceed industry standards and local laws.

7. PROHIBITION ON CHILD LABOUR

7.1 There shall be no use of child labour. Nobody shall be employed under the minimum age. The minimum age for these purposes is the higher of (i) the age of 15 or (ii) the minimum age

- for workers in the country or (iii) the mandatory age for schooling in the country. The use of legitimate workplace apprenticeship programmes, which comply with local laws, is supported.
- 7.2 Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions. Workers under the age of 18 shall not be required to carry out night work, overtime or work that is dangerous.
- 7.3 Adequate copies of official 'proof of age' documents for every worker must be kept. Where such documents are not available, an appropriate method to assess age must be used.

8. HEALTH AND SAFETY AND HYGIENE

- 8.1 Workers shall be provided with a safe place and systems of work such that their health is safeguarded and they are protected from accidents and injury arising out of or connected to their work or the workplace. This shall include but not be limited to the provision of health and safety training.
- 8.2 Workers shall receive health and safety training prior to starting work and this training shall be refreshed as appropriate during their employment (for example, due to changes in the workplace or duties, to ensure standards are maintained over time). Records shall be kept of the training that is carried out.
- 8.3 Workers shall be provided with a hygienic working environment, which shall include access to clean toilet facilities and to clean water.
- 8.4 Where workers are accommodated in premises operated by the employer then the employer shall ensure that the accommodation is clean, safe and meets the basic needs of the workers.
- 8.5 A senior member of management shall be assigned personal accountability for the health and safety of workers.

9. INHUMANE TREATMENT

- 9.1 All workers shall be treated humanely. They, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation

10. DISCIPLINARY POLICIES

- 10.1 A disciplinary policy, which adheres to the principles of natural justice, shall set out clearly for workers the procedures that shall apply in the event of a disciplinary issue arising. The policy shall be communicated and made available to workers. Workers shall be protected from any inhumane treatment and shall not be subject to workplace slavery as a result of the operation of the disciplinary policy.

11. GRIEVANCE POLICIES

- 11.1 Workers shall have easy access to a clear grievance policy which is operated fairly and affords them the right (whether alone or with other workers) to submit a complaint to their employer, whether that be about the employer's treatment of them or the conduct of a fellow worker or workers. Workers shall be protected from suffering any detriment, retaliation or victimisation for having raised a grievance.

12. EQUALITY IN THE WORKPLACE

- 12.1 Workers, their families and those closely associated with them shall be treated fairly and equally, irrespective of their nationality or legal status, and with dignity and respect. Migrant workers shall benefit from conditions of work no less favourable than those available to country nationals.

13. FREEDOM OF MOVEMENT

- 13.1 Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means.

13.2 There shall be no requirement placed on workers that they take accommodation in employer controlled premises except where this is necessary due to the location or nature of the work being performed.

14. EMPLOYMENT AND RECRUITMENT AGENCIES

14.1 The direct employment of workers is encouraged. However, where it is necessary to recruit workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must:

14.1.1 have the necessary licences and registrations under local laws;

14.1.2 agree to adhere to this Code of Conduct; and

14.1.3 agree to be audited to ensure their compliance with this Code of Conduct.

15. WHISTLEBLOWING

15.1 Any person concerned about a breach of this code or our Modern Slavery and Human Trafficking Policy may report their concerns on a confidential basis using the following procedures:

15.1.1 Inform the Legal Department

15.1.2 Inform the Human Resources Department

15.1.3 Use the Modern Slavery Helpline on 0800 0121 700.

15.2 Individuals with concerns are encouraged to provide their name and contact details so that the issues that they raise can be investigated. However, we recognise that in some circumstances an individual will only be prepared to raise their concerns on an anonymous basis and we commit to investigate anonymous allegations as thoroughly as possible and to take the necessary remedial action.

15.3 Contractors and their subcontractors are to ensure that details of our whistleblowing helpline are made available to all workers.

15.4 Employees may wish to seek advice before formally raising a concern externally and may contact Protect, a registered charity which advises on serious malpractice within the workplace. They can be contacted on 0203 1172520 (<https://protect-advice.org.uk/homepage/>).

15.5 Employees who wish to report potential issues should use the Modern Slavery Helpline on 0800 0121 700.

16 COMPLIANCE

16.1 Customers, contractors and suppliers have a duty to immediately report to SVH any breach of or deviation from this Code of Conduct.

16.2 If a contractor, customer, supply and vendors breaches this Code of Conduct, SVH reserve the right to request from the supplier or contractor a corrective action plan. This plan is to set out the steps that the supplier or contractor will undertake to rectify the breach. Should the corrective action plan not rectify the breach and depending on the severity of the breach, SVH reserves the right to terminate any contractual relationship that exists.

17 VARIATIONS TO POLICY

17.1 The Company's decision as to the interpretation and operation of this Policy is final. The Company reserves the right to amend or terminate this Policy at any time.