



Policies & Statements

Modern Slavery Policy

Version 1.2 April 2022
Policy Reference: POL-PPL-023

Modern Slavery Policy

POL-PPL-023, Version 1.2 April 2022

**1 POLICY**

- 1.1 Slavery and human trafficking ("Modern Slavery") are crimes and a violation of human rights.
- 1.2 Octavius has a zero-tolerance approach to Modern Slavery – any instance of Modern Slavery in Octavius's business or supply chain is a breach of the core values of the business.
- 1.3 Octavius recognises that the construction industry presents a risk of Modern Slavery and also that Modern Slavery could affect our business and supply chain. Low skilled immigrant workers are particularly vulnerable. Octavius therefore takes steps to reduce the risk of Modern Slavery being connected to its business or supply chain.
- 1.4 The following key principles apply to Octavius's business and our supply chain:
 - 1.1.1 Child labour must not be used.
 - 1.1.2 Any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice.
 - 1.1.3 Passports, visas and other personal documentation should not be taken from workers.
 - 1.1.4 All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation expenses or some other costs that they have no or little opportunity to repay.
 - 1.1.5 Compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits.
 - 1.1.6 Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health.
- 1.5 On an annual basis we will publish an anti-slavery statement which will set out our approach to prevent slavery and human trafficking in connection with our business.

2 PROCEDURES

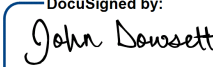
- 2.1 We are committed to implementing and enforcing effective systems and controls to ensure slavery or human trafficking are not taking place anywhere in our own business or in any of our supply chains. These systems and controls include: this policy; risk assessments; a supply chain protocol; tendering assessment criteria; a whistleblowing policy; contractual controls; and induction and monitoring at sites.
- 2.2 Our subcontractors, consultants and suppliers are contractually required to maintain similar effective systems and controls to ensure Modern Slavery is not connected to their services to Octavius.

3 POLICY RESPONSIBILITY

- 3.1 The Chief Executive Officer will be the lead role for the review and administration of this policy.

4 REPORTING CONCERNS

- 4.1 Guidance on reporting suspected slavery can be found at the Home Office's website: www.modernslavery.co.uk.
- 4.2 Suspicions of Modern Slavery existing or being connected to Octavius's business or supply chain can also be reported to your regular contact at Octavius or be raised with the Chief Executive Officer.

DocuSigned by:

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John Dowsett

Chief Executive Officer

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(Note: this version has the same content as the previous GOL Policy under the same name, reference PT-CP-470 dated 4th September 2020. This version contains minor names changes for the Business and other minor changes to reflect the standalone nature of Octavius).