



Policies & Statements

Modern Slavery Policy

Version 1.4 Jan 2025

Policy Reference: POL-PPL-023

1 Policy

- 1.1 Slavery and human trafficking ("Modern Slavery") are crimes and a violation of human rights. We recognise our responsibility under the Modern Slavery Act 2015 and will take proactive steps to ensure that slavery, servitude, forced or compulsory labour, and human trafficking do not take place within our organisation or any part of our supply chain.
- 1.2 We are committed to acting ethically and with integrity. 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 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:
 - 1.4.1 Child labour must not be used.
 - 1.4.2 Any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice.
 - 1.4.3 Passports, visas and other personal documentation should not be taken from workers.
 - 1.4.4 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.
 - 1.4.5 Compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits.
 - 1.4.6 Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health.

2 Scope of this policy

- 2.1 This policy applies to all individuals working for or on behalf of Octavius including employees, directors, agency workers, contractors, suppliers and business partners.
- 2.2 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 ensuring that:
 - this policy complies with the Modern Slavery Act 2015,
 - the business assesses the risk of modern slavery,
 - that the supply chain protocol and code of conduct are in place,
 - that Modern Slavery criteria are assessed at the tender stage for our supply chain,
 - a whistleblowing policy is in place,
 - contractual controls are in place to prevent modern slavery within their operations,
 - audits are undertaken to provide transparency in relation to labour practices and
 - our employees get training and awareness of this policy to understand and recognise the risks of Modern Slavery and human trafficking and how to report concerns.
- 2.3 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 People and Sustainability Director is the lead role for the review and administration of this policy.
- 3.2 Octavius will implement due diligence measures including
 - Conducting risk assessments of suppliers and business partners.
 - Auditing suppliers to ensure compliance with ethical labour standards.
 - Investigating and addressing any suspected instances of modern slavery

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4 Reporting concerns

- 4.1 Any concerns regarding modern slavery should be reported to the People Team at Peopleteam@octavius.co.uk. Reports will be treated seriously, investigated promptly, and appropriate action will be taken.
- 4.2 Whistleblowers will be protected against retaliation.
- 4.3 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.co.uk or be raised with the People and Sustainability Director or Chief Executive Officer.
- 4.4 Guidance on reporting suspected slavery can also be found at the Home Office's website: www.modernslavery.co.uk.

5 Monitoring and Review

- 5.1 We will review and update this policy as a minimum annually to ensure its effectiveness. We are committed to continuous improvement in tackling modern slavery and human trafficking.
- 5.2 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.

6 Approval and Endorsement

- 6.1 This policy has been approved by Octavius at the highest levels and is endorsed by the Chief Executive Officer of our organisation.

Signed by:

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