



Modern Day Slavery Policy

Modern day slavery is an international crime and a violation of fundamental human rights. It is a global problem that transcends age, gender and ethnicities. It may take various forms, such as slavery, servitude, forced and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It permeates many aspects of the legitimate economy and the construction industry is one of the many industries in the UK targeted by traffickers and illegal/unlicensed gangmasters. The Modern Slavery Act 2015 was introduced in the UK in October 2015 with the aim of stamping out slavery and trafficking and created a number of new criminal offences. It also increased penalties and strengthened the powers of the police and border forces. The Act also contains a number of measures intended to encourage businesses to take steps to address modern slavery.

The purpose of this policy is to provide information and guidance to all persons working for Sterling Harrington in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

Our Policy Statement

Sterling Harrington takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, consultants, suppliers and other business partners, and expect our supply chain to impose the same standards on their own supply chain. We will therefore require this policy to be included in our supply chain contracts and appointments, and to be complied with.

Policy Application

This policy applies to all persons working for Sterling Harrington or on its behalf in any capacity and within any part of our business, including employees at all levels, directors, officers, agency workers, site staff and our supply chain including all sub-contractors, consultants, service providers, joint venture partners and any other agents, third party representatives and business partners.

Compliance with the policy

All our employees must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those that either work for Sterling Harrington or are under our control to ensure the prevention, detection and reporting of any possible breaches of this policy. All our employees are encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage. Sterling Harrington encourages openness and transparency and any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our employees are encouraged to act without any fear of reprisal. If an employee believes or suspects that there has been a breach of this policy, or a breach may occur in the future, they must notify their line manager. Sterling Harrington will do everything it can to protect the confidentiality if this has been requested by an employee. However, employees are discouraged from making any disclosures anonymously, as this can limit the investigation process. Following an internal investigation, Sterling Harrington may decide to alert the police.



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Safeguards

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If an employee considers that they have suffered any such treatment, then they should inform their line manager in the first instance. Communication and awareness of this policy Sterling Harrington recognises its statutory obligations in connection with the Modern Slavery Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains. However, we recognise that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonable able, to prevent modern slavery from occurring:

- We will provide training on this policy to all our employees focussing on the risk Sterling Harrington's business faces from modern slavery in its supply chains.
- We will communicate Sterling Harrington's zero-tolerance approach to modern slavery and this Policy to all sub-contractors, consultants, joint venture partners and any other agents, third-party representatives and business partners at the outset of our business relationship with them and as appropriate thereafter.
- We will introduce contractual provisions for all our suppliers to confirm their adherence to this Policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We will review this Policy annually and update it where necessary.

Breaches of this policy

Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Any claims or allegations which are found to be malicious or vexatious will result in disciplinary action being taken against the individual. We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

Supply Chain and Third Party Compliance with this Policy

Those who are accessing this policy because they are either seeking to have or already have a business relationship with Sterling Harrington are also advised to familiarise themselves with this Policy and should refer any questions or comments to our head office.

Responsibility for the Policy

The directors of Sterling Harrington have overall responsibility for ensuring that this policy complies with the companies legal and ethical obligations, and that all those under our control comply with it. Management at all levels within our business are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.