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17, Dean Court, Armstrong Way, Avon, Yate, Bristol BS37 5NJ

Modern Slavery Policy (updated)

1. Introduction

Halls Electrical Ltd is committed to maintaining and promoting ethical business practices. We recognize that modern slavery, including forced labour, human trafficking, and child labour, is a pervasive issue that must be actively addressed. This policy outlines our commitment to preventing modern slavery within our operations and supply chain.

2. Scope

This policy applies to all employees, contractors, suppliers, and stakeholders associated with Halls Electrical. It encompasses all business activities and operations, including those conducted by our subsidiaries and affiliates.

3. Definitions

- **Modern Slavery:** Practices including slavery, servitude, forced and compulsory labour, and human trafficking, as defined by the Modern Slavery Act 2015.
- **Forced Labour :** All work or service extracted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, use of force, coercion, abduction, fraud, deception, abuse of power, or giving payments or benefits for the purpose of exploitation.
- **Child Labour:** Work that deprives children of their childhood, potential, dignity, and that is harmful to physical and mental development.

4. Policy Commitments

4.1 Zero Tolerance

Halls Electrical Ltd maintains a zero-tolerance approach to modern slavery and human trafficking within our operations and supply chain.

4.2 Compliance with Laws

We comply with all applicable local, national, and international laws and regulations regarding modern slavery and human trafficking.

4.3 Supplier Code of Conduct

All suppliers must adhere to our Supplier Code of Conduct, which includes strict prohibitions against modern slavery, forced labour, human trafficking, and child labour. Suppliers are required to comply with local labour laws and international human rights standards.

5. Risk Assessment and Due Diligence

5.1 Risk Assessment

We conduct regular risk assessments of our supply chain to identify and evaluate risks related to modern slavery. These assessments consider factors such as geographic location, industry sector, and the nature of the work being performed.

5.2 Due Diligence Processes

Our due diligence processes include:

- Screening new suppliers for compliance with our anti-slavery standards.
- Regular audits and assessments of existing suppliers, focusing on labour practices and working conditions.
- Incorporating modern slavery clauses into supplier contracts.

5.3 Grievance Mechanisms

We provide confidential and accessible grievance mechanisms for employees and workers in our supply chain to report concerns related to modern slavery. These mechanisms include anonymous hotlines, online reporting tools, and designated ombudsmen.

6. Training and Awareness

6.1 Employee Training

We provide training to all employees on modern slavery, helping them understand the risks, identify signs of modern slavery, and know how to respond appropriately.

6.2 Supplier Training

We offer training and resources to our suppliers to help them recognize and address modern slavery within their operations.

7. Reporting and Remediation

7.1 Reporting

We encourage employees, suppliers, and other stakeholders to report any suspicions or evidence of modern slavery. Reports can be made confidentially and without fear of retaliation.

7.2 Remediation

In cases where modern slavery is identified, we will take immediate and appropriate action, including:

- Working with the supplier to develop and implement a corrective action plan.
- Providing support to affected workers.
- Terminating relationships with suppliers who fail to comply with our anti-slavery standards.

8. Monitoring and Review

8.1 Continuous Monitoring

We continuously monitor our supply chain and business operations for signs of modern slavery and update our risk assessments and due diligence processes as needed.

8.2 Annual Review

This policy will be reviewed annually to ensure its effectiveness and relevance. Updates will be made as necessary to reflect changes in legislation and best practices.

9. Communication

This policy is communicated to all employees, suppliers, and stakeholders and is publicly available on our website.

10. Approval

This Modern Slavery Policy has been approved by the Halls Electrical Ltd Board of Directors and is endorsed by senior management.