

# H SIVYER (Transport) Ltd

# Anti-slavery and Human Trafficking Policy

Version 9 November 2022

### **Anti-slavery and Human Trafficking Policy**

Sivyer Group is committed to conducting its business in a lawful and ethical manner and expects its suppliers to conduct themselves in the same manner. A published set of principles for conducting business with Sivyer Group has been developed with which our suppliers are required to abide.

We take a zero tolerance approach to human trafficking and slavery, in our supply chains or any other part of our business. We require, among other provisions, that any party supplying us with services, materials, or finished products must not have used forced or prison labour to create those items. Forced labour includes, but is not limited to, all forms of slavery or practices similar to slavery, bonded labour, involuntary labour resulting from human trafficking, and labour subject to arbitrary abuse.

### Our supply chains

Sivyer Group procures a wide range of goods and services via a diverse and varied supply chain, including but not limited to the following:

- · Aggregate and Cement
- Facilities management services
- Communications and IT equipment services
- Temporary/Agency staff
- Various professional services
- Office equipment and supplies
- Plant Hire
- Lease Cars
- Commercial Fleet
- Utilities

While we understand that there are different legal and cultural environments in which factories operate throughout the world, we have communicated our expectations to all of our direct suppliers to ensure that materials incorporated into our products comply with all applicable laws, including those regarding slavery and human trafficking. All our suppliers that are qualified are required to agree to abide by those principles.

Our employees who have internal responsibility and accountability for supply chain management and procurement are trained to identify and mitigate the risks associated with all forms of forced labour. Additionally, all other employees are made aware of our policy and the methods of reporting violations.

We utilize internal resources and third party firms to monitor social compliance to ensure that our suppliers are abiding by our principles regarding forced labour; additionally, certain customers will conduct social compliance audits of our suppliers and will advise us of their findings.

#### **Employee policies**

Sivyer also recognises the potential for slavery and human trafficking to affect employees working within its business.

To ensure its employees are not subject to undue influence and are treated with dignity and respect, Sivyer has robust HR policies and procedures in place across all its operations. These are regularly audited to ensure compliance with employment legislation and prevent unethical working practices. Sivyer is committed to ensuring that all staff receive fair remuneration for the job they perform and undertakes regular reviews of terms and conditions across the workplace.

Audits are conducted on both a scheduled and unscheduled basis. If violations are found, we may, at our discretion, require corrective action measures to be taken or may cease to do business with the supplier.

#### Review

This policy will be reviewed:

#### Annually.

Following a change in procedures.
Following a change in legislation.
If it is found to be inadequate
If requested by the review board following a major concern.

Date For Next Review: November 2022

Simon J Sivyer Managing Director

For and On Behalf of H Sivyer (Transport) Limited. Dated: ......November 2022 .....