

MODERN SLAVERY POLICY



Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as (but limited to) slavery, servitude, forced and compulsory labour and human trafficking. These all result in the deprivation of a person's liberty by another, in order to exploit that individual or individuals for personal or commercial gain.

M&P has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings. M&P commit to auditing our operations and working systems to prevent modern slavery within our activities and those of our supply chain.

All business details of the Company shall be transparent and will comply with any disclosure obligations contained within the Modern Slavery Act 2015.

Scope

This policy statement applies to:

1. All Company business operations for the purpose of the supply, hire, repair, service and calibration of surveying equipment to its customers.
2. All business operations pertaining to the procurement of services & products from its business partners/suppliers.
3. All business operations pertaining to the engagement of personnel for the purpose of carrying out Company business operations.

Definitions

1. "Company" shall mean M&P
2. "Management Team" shall mean the Managing Director and such other senior personnel deemed applicable by the MD.

Responsibilities

1. The Managing Director has responsibility for the prevention of modern slavery within the business.
2. The Managing Director has overall responsibility for the implementation & compliance with the contents of this policy but may delegate functions of compliance to suitable senior management personnel.
3. All M&P personnel must partake in the prevention, detection and reporting of bribery and/or other forms of corruption.
4. All M&P personnel are required to avoid any activity which might lead to a breach of this policy (and refer it to the Management Team).

Legislation

1. Modern Slavery Act 2015

The Company will adopt the requirements of all applicable legislation and best practice standards. The Company will comply with the requirements of S54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 which requires, where applicable, the publishing of an annual *statement* setting out steps taken to prevent modern slavery.

MODERN SLAVERY POLICY

Reference:	011.2.2018.PL
Revision No:	7
Date of 1 st Issue:	22/01/2018
Current issue date:	08/12/2022

Policy Aim & Commitments

Company Commitment:

The Company is committed to:

1. Act in a manner which is fair & transparent within its business dealings.
2. Operate in a manner which adheres to all legal obligations (such as the Modern Slavery Act 2015), ethical standards and fundamental human rights set out by the principles of the International Labour Organisations & UN Guiding Principles on Business & Human Rights Link: https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf
3. Work with its employees, supply chain, and partners to raise awareness & ensure adherence to acceptable codes of practice (that are compliant with all current and relevant legislation and standards).
4. Communicate the commitments within this policy via appropriate channels.
5. Raise awareness of modern slavery issues including how to spot the signs within its operations or within its supply chain.
6. Maintain provision for making whistleblowing reports (whistleblowing policy) and necessary escalation guidelines specifically for reporting modern slavery concerns
7. Identify and manage areas of Company risk, including any high risk materials/labour sourcing.
8. Strictly address and directly prohibit any and all practices that are known or ought reasonably to be known to contribute to the risk of modern slavery.
9. Promote a collective commitment to good working practices.
10. No M&P personnel will suffer detriment or unfavourable treatment for reporting genuine concerns for investigation in accordance with this policy.
11. The Managing Director will have overall responsibility for preventing modern slavery within its operations.
12. The Company commits to address and directly prohibit practices known to contribute to the risk of modern slavery via the operation of this policy.

Staff Commitment

1. All M&P personnel are required to read, understand and comply with this policy.
2. Act in accordance with M&P procurement policies, anti-bribery and corruption policies.
3. Personnel are responsible for reporting suspected:
 - 3.1 conflicts
 - 3.2 suspicious activities
 - 3.3 suspicious treatment or dealings
 - 3.4 coercive behaviours
 - 3.5 abusive or exploitative behaviour which may amount to slavery within our Company business operations (as set out in the "Scope" section) to M&P Management.
4. Personnel are encouraged to raise any concerns, even when unsure, as soon as possible.
5. If you believe that you have personally suffered any treatment set out in this policy you must report this to your line manager and formally raise the matter using the Hexagon Geosystem UK formal Grievance procedure as set out in your contract of employment. This is also available on request.
6. M&P operate a zero tolerance approach to modern slavery. All personnel are responsible for ensuring this zero tolerance approach is clearly communicated to our business partners at the outset of any business relationship and is re-enforced as appropriate thereafter.

Identified Risks

The Company has identified the following potential risk areas (for potential Modern Slavery & exploitation practices) within its operations:

MODERN SLAVERY POLICY

Reference:	011.2.2018.PL
Revision No:	7
Date of 1 st Issue:	22/01/2018
Current issue date:	08/12/2022

- Recruitment of personnel
- Use of agency staff via recruitment agencies
- Procurement of goods from suppliers
- Use of outside labour within its operations such as security, cleaning personnel, personnel who might service facilities such as alarms, security arrangements, electrical works (all of which fall under Company Supplier arrangements).

The Company works closely with any recruitment agency engaged by it to ensure it operates to best practice standards. Recruitment of personnel is undertaken in accordance with current government best practice recommendations. All personnel are required to produce evidence of their right to work in the UK.

The Company undertakes assessment of its supply chain by suitable onboarding process and a system of continual assessment by fostering close working relationships with its supply chain. The Company undertakes appropriate formal supply chain auditing. Responses are assessed by appropriately competent personnel. Concerns can be flagged to Company group level compliance and/or group legal as required.

What is Modern Slavery?

What does modern slavery look like? Slavery is more likely (but not exclusively) to happen where the rule of law is weaker. Someone is in slavery if they are:

- Forced to work: through coercion, or mental or physical treat
- Owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Dehumanised, treated as a commodity or bought and sold as “property”
- Physically constrained or have restrictions placed on their freedom of movement

Here are the most common forms of modern slavery:

- Forced Labour: any work or services which people are forced to do against their will under the threat of some form of punishment
- Debt Bondage (or bonded labour): the world’s most widespread form of slavery. When people borrow money they cannot repay and are required to work to pay off their debt, then losing control over the conditions of both their employment and the debt.
- Human Trafficking: involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.
- Descent based slavery: where people are born into slavery because their ancestors were captured and enslaved they remain in slavery by descent.
- Child Slavery: occurs when a child is exploited for someone else’s gain.

The Company has considered its operational risks (in the context of this policy) and does not feel it is subject to any identifiable high-risk areas within its operations.

MODERN SLAVERY POLICY

Reference:	011.2.2018.PL
Revision No:	7
Date of 1 st Issue:	22/01/2018
Current issue date:	08/12/2022

Implementation of policy & assessment of risk

The Managing Director has responsibility for the prevention of modern slavery within the business. The Managing Director has overall responsibility for the implementation & compliance with the contents of this policy but may delegate functions of compliance to suitable Senior Management personnel.

This policy has been created to raise awareness of risk and provide a framework for identifying those risks within its business operations and within its supply chain.

The policy will be reviewed and subsequent revisions circulated to all personnel. Any communications pertaining to identified risks will also be circulated to all relevant personnel.

Any relevant updates on the identification and reporting of slavery will be circulated to all personnel as necessary.

Third parties and agents

The Company expects high standards from all persons acting as agent on behalf of the Company and all its business partners. The Company expects those identified agents and partners to comply with all applicable laws and regulations.

Parties/agents are expected to consider modern slavery risks and build them into their operational due diligence activities.

Reporting Suspected Slavery

General

The Management Team is committed to creating an environment in which personnel feel able to raise genuine concerns in good faith without the fear of detriment (even if their concerns turn out to be mistaken). No person shall suffer detrimental treatment because of raising any concern connected with this policy. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment.

Personnel with knowledge of slavery in any form should not remain silent.

The National Referral Mechanism (NRM) is a government framework for identifying and referring potential victims of modern slavery and ensuring they receive appropriate support.

The UK Government has designated organisations to act as "First Responders". First Responders are organisations in England and Wales authorised to refer a potential victim of Modern Slavery to the NRM. First Responders help identify and support potential victims of modern slavery.

MODERN SLAVERY POLICY

Reference: 011.2.2018.PL
Revision No: 7
Date of 1st Issue: 22/01/2018
Current issue date: 08/12/2022

Further (current Government advice) can be viewed here:

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

You do not have to be a First Responder to help identify and support potential victims of modern slavery. The following resources are available for reporting (*however please refer to the escalation process set out below*):

1. Call dedicated helpline: 08000 121 700
2. Call the Salvation Modern Slavery Human Trafficking Helpline: 0800 818 3733 and 0800 808 3733 which is available 24/7
3. Call the Modern-Day Slavery Foundation helpline: 0800 0121 700- open 24 hours a day
4. Use website www.modernslaveryhelpline.org

Escalation

- All concerns should initially be raised with the Management team in writing
- Where a concern is raised with the Management team this will be acknowledged
- The Company will take appropriate legal action under the guidance of Company solicitors for the immediate rectification of any identified infringement
- Wherever slavery practices have been identified within the Company supply chain the Company will suspend the approved supplier status of the offending party and will (collaboratively where possible) carry out a suitable investigation of the supplier practices under the guidance of Company solicitors.
- The Management Team shall notify all relevant parties of ongoing supply chain investigations (and results)
- Where it is not possible to raise a concern in writing with the Management team it is possible to raise a report using the dedicated numbers given above

Compliance & Review

1. The Managing Director will be responsible for managing the compliance of all personnel with the remit of this policy.
2. The Managing Director is responsible for the suitable review of the remit of this policy and appropriateness of its content to Company business operations and practices.
3. All M&P personnel are responsible for working as trained and in accordance with this policy and issued working instructions.
4. Implementation, compliance, and review may be delegated to other personnel as deemed appropriate.

Signed:

Print name: Kevin Smith



Position: Managing Director

Revision No: 7

Date: 08/12/2022

Next review: 08/12/2023