



VHE CONSTRUCTION PLC

Modern Slavery Policy

Modern Slavery is a crime which occurs in many forms and for the purpose of this Policy includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are normally conducted for the purposes of either personal or commercial gain and without exception result in the abuse and exploitation of an individual's human rights.

Whilst, as an employer, VHE Construction plc is satisfied that its UK business activities are free from acts of Modern Slavery, we are fully committed to the eradication of Modern Slavery in all its forms and as a Company we will not engage in, nor will we condone or tolerate, any act of Modern Slavery within any aspect of our operations or within our Supply Chain.

As a Company we will act transparently, ethically and with integrity, both internally and across all of our business relationships. Appropriate action will be taken in response to any identified act of Modern Slavery.

Human Trafficking

Human trafficking involves men, women and children being brought into a situation of exploitation through the use of violence, deception or coercion and being forced to work against their will in jobs or conditions to which they did not agree. Human trafficking not only occurs across international borders but also nationally and even within individual communities.

Bonded Labour

Bonded labour is one of the least known, but most widespread, forms of slavery across the world. A person is said to become a bonded labourer when their labour is demanded as a means of repayment for a loan, with the labourer ultimately working for very little or no pay. Debts created by bonded labour activities are often passed onto the next generation of the family thereby continuing the bond.

Child Labour

Child labour is defined as labour resulting from any form of slavery, or practice similar to slavery, including the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour.

A child is defined as any individual under the age of 15, or the local minimum employment age, or the mandatory school age, whichever is the higher. Where a particular country permits a worker to be employed under the age of 15, the principles of this Policy will apply and any such individuals will be classed as children and unable to be employed in the provision of services or goods to VHE Construction plc.

Where employment involves work in hazardous conditions, no individual under the age of 18 must be employed on such activities.

To assist in determining what constitutes hazardous conditions and to avoid the exposure of anyone under the age of 18 to such conditions, the following principles will be applied:

- Work which exposes an individual to the possibility of any form of physical, psychological or sexual abuse
- Work carried out underground, under water, at height or in confined spaces
- Work with dangerous machinery, equipment or tools
- Work which involves the manual handling or transportation of heavy loads
- Work in any environment which may expose an individual to hazardous substances, agents or processes or to temperatures, noise levels or vibration which may cause harm to health
- Work under difficult conditions including long hours, night work, or work where an individual may be unreasonably confined to the employers premises for long periods of time



The temporary employment of younger persons within work placement, internship, apprenticeships or other seasonal work which is common and customary practice within industry is exempted from the requirements of this Policy providing that any such employment:

- Does not interfere with compulsory schooling and has the permission of the school in respect of work placements
- Is being undertaken with the full permission of the individual's parent or guardian
- Is directly supervised by a competent person
- Does not violate any relevant legislation
- Has been subject to a full assessment in respect of health, safety and well being

Forced Labour

Forced labour is defined as any work or labour which is extracted from an individual under the threat of penalty for its non-performance and for which the worker does not offer themselves voluntarily. It does not necessarily follow that the provision of wages or other compensation to an individual indicates that the work is not forced or compulsory.

Forced labour may include, but is not limited to the following:

- Work undertaken by an individual where that individual has no choice whatsoever about whether to undertake the work or not
- The work or service of prisoners if they are hired out or placed at the disposal of private individuals, companies or others involuntarily and without the supervision of the relevant public authorities
- Involuntary labour required by the authorities including assistance in construction, agriculture and other public works
- Bonding through debt
- Work required to punish opinion or expression of views ideologically opposed to established political, social or economic systems

VHE Construction plc will clearly communicate its commitment to the eradication of Modern Slavery and the requirements of this Policy to members of its Supply Chain.

Suppliers within the VHE Construction plc Supply Chain will, as a minimum, be required to comply with the requirements of this Policy and, as part of any supplier assessment, appraisal or audit programme, will need to provide appropriate and current confirmation of their compliance with the requirements outlined above.

VHE Construction plc will take appropriate steps to raise awareness of Modern Slavery issues across its workforce and in particular the commitment and requirements contained within this Policy.

Any employee, temporary worker or sub contract employee who perform work on any site operated by VHE Construction plc, is required to fully conform with the requirements of this Policy as outlined above. This includes reporting any instance of potential Modern Slavery to either their Department Head or the HR Department for investigation/action.

The requirements of this Policy will be reviewed annually by the board of Directors to ensure its continued suitability and effectiveness.

Gordon Wilson
Managing Director