

PS14 MODERN SLAVERY POLICY & PROCEDURE

Introduction

This statement has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that Miles Partitioning Industries Limited will take to understand potential modern slavery risks related to its business activities and supply chains. This statement relates to actions and activities during the current financial year.

Miles Partitioning Industries Limited is committed to preventing modern slavery in its business activities and its supply chains and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

Policies

We are committed to the prevention of modern slavery which includes servitude, forced labour, human trafficking and child slavery.

Our Modern Slavery policy is delivered through a range of associated policies and procedures:

- ✓ Ethical Code of Conduct Policy
- ✓ Recruitment Policy
- ✓ Environmental Policy
- ✓ Corporate Responsibility Policy
- ✓ Work Safe & Whistleblowing Policy

Ultimate responsibility for ensure prevention of modern slavery and for monitoring compliance to this modern slavery policy is held by is by Mark Lee, Director. This responsibility includes monitoring of employee salary, employment rights and supply chain communication cascades.

About Miles Partitioning Industries Limited

Miles Partitioning Industries Limited are an established and successful company that specialize in the design, fit-out and refurbishment in the built environment. Activities include the contract management of wall drylining, suspended ceilings, second-fit joinery, screeding, plastering and rendering. We deliver high quality contracts in the United Kingdom from concept to completion for blue chip clients in the retail, office, hospitality & leisure, industrial, technology and public sectors.

We employ circa 17 people from our Worcestershire based head office. Our installations are conducted by sub-contracted self-employed individuals and limited companies, generally sole traders, micro and small employers.

Our supply chain includes the procurement of drying systems eg plasterboard, gypsum products, suspended ceilings, timber, architectural ironmongery with elements of sub-contracted mechanical and electrical works. All our materials are purchased from UK based suppliers, however materials may be manufactured in the UK, EU or in non-EU countries.

Whilst not a large company and thus not covered by the specific requirements of the Modern Slavery Act, we are key contractors to large companies, and thus form an essential part of their due diligence programmes.

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Understanding the Risks of Modern Slavery

The key direct risks of Modern Slavery, and the associated risk control measures, to Miles Partitioning Industries are:

- Freedom to choose to work for us: All employees are free to leave after reasonable notice is served and labour is not forced, bonded and non-voluntary prison labour isn't used;
- Labour Trafficking: For all employees, including any temporary workers, we have received sight of original documents proving Right to Work in the UK eg passports, birth certificates, work permits, and have retained copies of these;
- Working Hours: Employee working hours are compliant with national laws or industry standards;
- Wages and Remuneration: We provide wages and benefits that at least meet relevant industry benchmarks or national legal standards;
- Contracts of Employment: all employees have suitable contracts of employment. Whilst reliant on CIS operatives we don't have zero hours contracts;
- Health and Safety: We take appropriate measures to ensure the health and safety of your employees and others;
- Harassment and Intimidation: We under no circumstances allow any employee to harass, abuse or intimidate any other employee or person, in any fashion, and that you have appropriate grievance, disciplinary and appeal procedures in place.

Key risks within our supply chain are considered below:

- Gypsum Products: the majority of Gypsum products are manufactured in the UK or EU by leading manufacturers eg British Gypsum, who are blue chip companies.
- Architectural ironmongery, Mechanical and electrical systems: Whilst purchased from UK based suppliers, these are a mix of manufacturers and intermediaries, some of which will be importing from outside the UK eg from China and India, who are high risk countries of origin as defined by the Global Slavery Index 2016.

In regards our supply chain our company is a micro company and thus our ability to influence the supply chain is limited. We do not sub-contract work. We will however implement due diligence in our supply chain in relation to modern slavery:

- We will issue supplier questionnaires to all our key suppliers to enable us to undertake compliance checks to our requirements and to legal requirements regards modern slavery.
- Our contractual requirements require that modern slavery is not permitted;
- We expect our customers to deliver the same ethical treatment of us as a supplier, particularly in regards to payment terms and conditions, rates of pay and timely payment of applications.

Staff Training

We will provide all management staff training in relation to modern slavery.

Assessing Effectiveness

The delivery of this modern slavery policy shall be monitored and shall form part of annual management performance review.

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Corrective Actions

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions or externally with the supply chain then appropriate corrective action shall be taken in line with the company's Control of Non-Conformity Procedure. All non-conformity shall be recorded and the required actions implemented in a timely manner.

Policy Review

This will be subject to review following any lessons learnt, identification of non-compliance and as a minimum annually.

Policy Approval

As the individual ultimately responsible for company compliance I endorse this policy.

Signed on behalf of Miles Partitioning Industries Limited



Mark Lee, Director, 01 June 2020

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