

Introduction:

The Anti-Slavery and Human Trafficking Policy applies to the following legal entities: **Class One Traffic Management Limited; Chelsey Bidco Limited; Chevron Green Services Limited; Chevron Traffic Management Limited, Shift Traffic Events Limited and Highway Resource Solutions Limited, which shall together be referred to as the **Chevron Group**.**

The **Chevron Group** recognises that slavery and human trafficking is illegal, a crime and a violation of human rights, but remains a hidden blight on our global society. Slavery and human trafficking have many different forms, these include forced labour, child labour, exploitation, being sold or treated as a commodity and having restrictions on freedom of movement etc.

The **Group** has a Zero Tolerance approach to Modern Slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and developing and implementing effective management systems and controls that ensure that nowhere in our business or supply chain is involved with Modern Slavery. Using and raising awareness of the indicators of forced labour as set out by the International Labour Organisation (ILO) will help us deliver that approach. Indicators include:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

By ensuring that our business is transparent, we will ensure we will comply with the disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our Supply Chain will also hold their own Supply Chain to the same high standards.

Scope:

This policy applies to all those employed or working on behalf of the **Group, in any capacity.** This includes but does not limit the policy applicability to, employees, agency workers, temporary staff, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we reserve the right to amend it any time.

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Responsibility:

The **Group's** Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Head of ESG and Improvement has primary responsibility for implementing this policy. This will include monitoring its use and effectiveness and auditing internal control systems and procedures as part of our Integrated Management System to ensure they are effective in countering Modern Slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of Modern Slavery within supply chains.

As with all of the **Group's** policies and procedures, employees are invited to comment on this policy and suggest ways in which it might be improved, this can be done through the Employee's line manager.

Compliance:

Individuals and/or Organisations working for or on behalf of the **Group** must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. They are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If anyone believes or suspects that a conflict with this policy or possible breach has occurred, or may occur in the future, it must be reported to the relevant manager as soon as possible. This can be done in accordance with the **Group's** Whistleblowing Policy. Or alternatively report it to the Modern Slavery Helpline on 08000 121 700 <https://www.modernslaveryhelpline.org/>.

Individuals and/or Organisations working for or on behalf of the **Group** are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it immediately with the relevant manager.

Risks:

Delivering works in the UK construction sector provides a number of challenges and risks in relation to slavery and human trafficking such as:

1. The reliance on temporary workers due to a skills shortage
2. Product and material supplies coming from the Far East

The **Group** will address these risks through the actions set out below.

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Actions:

The **Group** will ensure compliance by identifying and mitigating risk in the following ways: -

- Sign up and commit to the Gangmasters & Labour Abuse Authority Construction Protocol, and work with the GLAA and other partners in reducing opportunities for exploitation and slavery;
- Annual training for all employees in understanding what Modern Slavery is, and how to recognise the signs of slavery etc;
- Enhanced vetting and reviews of our supply chain (contractors, sub-contractors, policies, contracts etc.);
- Raise awareness of Modern Slavery within our Supply Chain partners;
- Regular internal audits as part of our Integrated Management System on both our own policies and procedures, as well as those of our Supply Chain. For example, checking whether all employees are paid at least the minimum wage and have the right to work;
- Use of labour monitoring and payroll systems;
- Encourage the reporting of concerns and the protection of whistle blowers;
- The **Group** will not knowingly support or deal with any business involved in slavery or human trafficking.

Breaches of this Policy:

Any employee found in breach of this policy will face disciplinary action, this could result in dismissal in accordance with the **Group's** HR Policies. The **Group** may terminate our relationship with other individuals, contractors, agencies or other suppliers working with the **Group** if they are found in breach of this policy.

Review:

The **Group** will regularly review the effectiveness of the policies and procedures on the basis of reports received, changes of regulation and legislation, changes of working practices and in any event at intervals not exceeding 12 months.

Communication:

Our Policy is communicated to all employees and is made available to our supply chain and other interested parties to inform them of our zero-tolerance approach to modern slavery and to promote wider adoption of responsible practices.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our business's slavery and human trafficking statement for the year ended 31st December 2021.



Tim Cockayne
CEO
January 2022

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