

## **Pinewood Structures Limited Anti-Slavery Policy 2021**

### **Supplier Code of Conduct – Slavery and Trafficking**

#### **Introduction**

Pinewood Structures Limited is committed to implementing systems and controls aimed at ensuring that individuals' human rights, (as outlined in the European Convention on Human Rights), are respected and that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

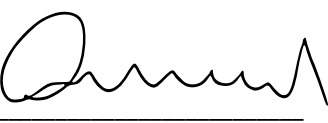
Our suppliers, contractors and business partners are required to adhere to the principles in this Code, to provide responses to questions that we may ask related to their compliance with this Code and to engage with audits which we may choose to undertake. Similarly, we expect them to require the same standards, conduct and cooperation of their own sub-contractors, suppliers and business partners.

#### **Code of Conduct – Principles**

- Workers must be working voluntarily. Workers shall not be subject to force, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime and their broader human rights shall also be respected.
- Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice, (contractual or otherwise), in accordance with applicable laws and collective agreements and without the imposition of any improper penalties.
- Workers shall not be mentally or physically coerced to provide their labour.
- Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.
- Fees or costs associate with the recruitment of workers, (including but not limited to work visas, travel costs and document processing costs), shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- Workers shall have their terms of employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of

applicable laws and collective agreements where work is carried out.

- Wages should be paid regularly and directly to the worker and in legal tender. Methods of payment that have the effect of depriving the worker of the ability to terminate employment are prohibited.
- There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, in workers under the age of 18 are employed, (including under apprenticeship training programmes), then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.
- Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment, including but not limited to, physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant workers, their families and those closely associated with them should not be subjected to discrimination due to their nationality.
- Workers shall be free to file grievances to their employers about the employers' treatment of them and workers shall not suffer detriment, retaliation or victimisation for having raised a grievance.
- Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer controlled locations, (e.g. accommodation blocks), nor shall they be confined by indirect means. There shall be no requirement placed on workers that they take accommodation in employer controlled premises except where this is necessary due to the location or nature of the work being performed.
- Where it is necessary to recruit workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged.
- Contractors and their subcontractors are to ensure that this Code of Conduct is available to all workers who will be working on any of our sites.
- Any person concerned about a breach of this Code of Conduct may call the Modern Slavery Helpline on 0800 121 700.

Signed; 

Date; 22/1/2021

Geoff Arnold (Chief Executive)