



## Slavery & Human Trafficking Statement

Pevensey Coastal Defence Limited ('the Company')

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.

### Introduction

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Anyone representing the Company is expected to be aware of and to follow the guidance outlined in the Company's Anti-Slavery and Human Trafficking Policy and to report concerns. They are required to act whenever concerns are raised whether from within or from outside of the business.

### Organisation's Structure

The Company is a construction company operating on a single site in Pevensey Bay. The Company has its head office in Fareham, Hampshire

### Our Supply Chain

Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on the Pevensey site. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with all suppliers and subcontractors and make clear our expectations of business behaviour.
- We encourage the reporting of concerns and the protection of whistle blowers.

### Our Policies on Slavery and Human Trafficking

We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere within our supply chain.

### Adherence to our Values

We have zero tolerance to slavery and human trafficking and we expect everyone in our shareholding companies, supply chain and subcontractors to comply with our values.

### Training

Although the Company does not employ anyone directly, directors representing parent companies ensure a high level of understanding of the risks of modern slavery and human trafficking is maintained within the supply chain and in any of their own staff working on behalf of the Company.

Guy Hardacre  
Chairman, Pevensey Coastal Defence Ltd

June 2017



## Anti- Slavery & Human Trafficking Policy

### Policy statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Pevensey Coastal Defence Ltd (the Company) has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working on behalf of the Company, in any capacity, including directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

### Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Mr Ray Richards (Company Secretary) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. He is also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

### Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chain, is the responsibility of all those working on behalf of the Company or under the Company's control. Everyone is required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of, or conflict with, this policy has occurred, or may occur, you must notify the responsible person or report it to the Company's site manager. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.



The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

## Training and communication

Training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to those representing the Company as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

## Breach of the policy

Anyone representing the Company who breaches this policy will be removed from the position they occupy.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.