



# Slavery, Human Trafficking and Child Labour Policy

Procast Building Contractor's is proud of the ethical standards that it has embedded into its business over many years and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Slavery and the trafficking of people have no place in the modern world, and Wates considers that the new legislation will become an important part of doing business both in the UK and overseas. We are therefore committed to enhancing our practices to combat slavery and human trafficking.

## **Procast Building Contractors Structure**

Procast is an independent and family owned construction, house building, maintenance, building services and facility management services company. Our work takes place predominantly in the UK. Procast has an annual turnover of approximately £9 Million.

This statement is made on behalf of Procast in accordance with the requirements of the Modern Slavery Act 2015 and its contents take account of the activities and supply chains of them all.

## **Our Policy on anti-slavery and Human Trafficking**

We are committed to ensuring, so far as we are able, that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we take a zero-tolerance approach to slavery and human trafficking. Our supply chains include sub-contractors, suppliers, labour agencies and professional services providers. Our Anti-Slavery and Human Trafficking Policy reflects a long-standing commitment to acting ethically and with integrity in all our business relationships, supported by the development and implementation of effective systems and controls.

## **Our anti-slavery and Human Trafficking assurance process**

As part of an initiative to identify and mitigate risk in respect of slavery and human trafficking, we have:

- Undertaken a slavery and human trafficking risk assessment to enable us to apply a risk based and proportionate approach to dealing with slavery and human trafficking issues;
- Developed and agreed our Anti-Slavery and Human Trafficking Policy based upon our risk assessment;
- Reviewed the contracts that we have with our supply chain, and amended these to require compliance with the Modern Slavery Act 2015 where appropriate. For those of our supply chain with whom we have entered a Wates Group trading agreement, we have enhanced our audit process to include slavery and human trafficking issues;
- Mandated, where appropriate, that our supply chain be registered with the Constructionline validation system, which requires our supply chain to confirm their compliance with the Modern Slavery Act;
- Widened the scope of the Wates Group whistle-blowing procedures to include the reporting of modern slavery and human trafficking issues, so that any individual may confidentially raise a potential issue; and
- Begun implementing targeted training for those involved in procurement and/or with responsibility for supply chain management.

Finally, we are currently developing a third-party auditing process for targeted, high risk projects in circumstances where we are procuring directly.

### **Training**

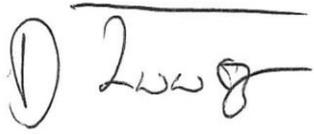
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we will provide training to our staff that is proportionate to the level of risk.

### **Our Policy on Child Labour**

Procast does not engage in or support the use of Child Labour. If Procast engages any young worker (for example, for work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work any more than 8 hours per day.

### **Developing for the future**

As our approach to slavery, human trafficking and Child Labour develops, we will also devise a process of monitoring and measuring our performance so that we can assess how well we are doing and whether additional procedures may be necessary. We are committed to reporting publicly about our performance each year. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Procast for the financial year ending 30<sup>th</sup> September 2018

A handwritten signature in black ink, consisting of a circled 'D' followed by the name 'Innes' in a cursive script. A horizontal line is drawn above the signature.

Derek Innes

Managing Director

January 2019