



## MODERN SLAVERY POLICY

### Scope

This guidance applies to all employees of each Fortel Group Company ('Fortel').

### Purpose

Fortel has a policy of strict compliance with all laws. This Policy sets out how the Modern Slavery Act 2015 applies to Fortel.

### Definitions and Notes

None

### Associated Documents

Legislation and Compliance Policy  
Modern Slavery Policy Guidance  
Speak Up Policy

### Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Fortel has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings, relationships and to implementing and enforcing effective systems, controls, awareness and training to eliminate all forms of exploitation anywhere in our business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Fortel is a founding signatory of the Gangmaster Labour Abuse Authority ('GLAA') [Construction Protocol](#) committed to:

- Working in partnership to protect vulnerable workers
- Sharing information, where possible, to help stop or prevent the exploitation of workers
- Working with the relevant parties to manage information sensitively and confidentially
- Raising awareness within the supply chain
- Maintaining momentum through this protocol by communicating regularly

Fortel have agreed to raise awareness within its supply chain to help to prevent and protect workers from exploitation or abuse and take necessary steps to ensure that exploitation and abuse of workers is recognised and addressed with appropriate safeguards put in place to ensure that exploitative practice is not repeated

### Policy

Fortel is committed to Ethical Fair Trading based on Anti-Slavery Principles that ensure every member of our workforce receives a fair day's pay for a fair day's work, and that our businesses and suppliers follow these principles.

Our pursuit of excellence in this ethical approach is not an option but a business necessity, which will be achieved by ensuring:

- Employment is freely chosen – there will be no bonded, involuntary or forced labour. Employees can freely leave our employment by giving reasonable notice without any detriment.



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- Our workforce has the freedom and right, without discrimination, to collective bargaining, to join or form Trade Unions and to recognise those unions and their activities.
- Workers will enjoy a safe and healthy working environment, they shall be treated fairly, inducted, receive appropriate training and provided with adequate welfare facilities.
- Child labour is not to be used and persons under the age of 18, that are legally permitted and willing to work, are not put at risk by employing them at night or in hazardous conditions.
- The Living Wage or National Minimum Wage, as appropriate, is paid as a minimum and not subjected to any unlawful deductions. Temporary Workers who qualify for equality under the Agency Worker Regulations 2010 will receive comparable pay to that of our clients permanent employed comparator.
- Payment of wages is made directly into our workers own bank accounts and not to any third party. All workers are given information about their working terms and conditions in respect of benefits and pay.
- Working hours are not excessive and comply with the Working Time Directive. Overtime will be voluntary and not forced upon workers.
- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- There will be no physical or verbal abuse or threat of physical or verbal abuse, sexual or any other type of abuse, harassment or intimidation.

### Compliance with the policy

The prevention, detection and reporting of modern slavery or any forms of exploitation in any part of our business or supply chains is the responsibility of all those working for us, on behalf of us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Line Manager or the Commercial and Compliance Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our staff, suppliers and clients to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with Fortel's Commercial and Compliance Director.

Fortel aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our business, clients or supply chain.

### Communication of the policy

Our zero-tolerance approach to modern slavery must be communicated to all employees and persons working on our behalf.

This policy will be reviewed annually.



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**Modern Day Slavery**

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End

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