

1. Policy Statement

Fowler Building Contractors Ltd (Fowlers) is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers. We will act ethically and with integrity in all our business dealings and relationships and implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our organisation or supply chains.

For the purpose of this document, we consider modern slavery to include:

- Traditional forms of slavery and abuse: Situations such as human trafficking and the use of force, coercion, or deception to exploit people for their labour or services.
- Non-traditional forms of slavery and abuse: Situations where individuals may be subject to exploitation, abuse, or forced labour due to language barriers, social isolation, or other forms of vulnerability. This may include situations where individuals work in highly stressful environments, or where interns/apprentices are expected to perform menial tasks that are not part of their training or development, creating opportunities for abuse or exploitation.

2. Risk Assessment

We will conduct regular risk assessments to identify areas of potential risk and take necessary actions to mitigate them. Our risk assessment will take into account geographical locations, sectors and industries, our workforce and supply chains, and any other relevant factors. We will use our risk assessment to inform our due diligence processes and ensure that our policies and procedures are effective in preventing slavery and human trafficking.

The following factors significantly reduce the risk of modern slavery within our organisation:

- Fowlers operates exclusively in the highly regulated construction sector within the UK. All work is carried out in accordance with UK Government tax regulations and the UK's health and safety regime.
- Our work is not seasonal and does not rely on large numbers of unskilled labour at specific times of the year.
- Our work is generally skilled and requires competent, capable skilled operatives who carry validated trade or professional qualifications.

- As a regional operator our sub-contractor supply chains are generally relatively short and use established and regular contractors, who also work exclusively within the regulated UK economy.
- Work on our sites is always monitored by our own employees allowing a high degree of control and visibility of our own work.
- The majority of our material supplies that are used on our sites are generally sourced through UK distributors or UK companies within our supply chain, allowing strong commercial controls to be applied to encourage compliance with the Modern Slavery Act 2015. Material sourced from outside the EU is rare and the isolated nature of this procurement allows bespoke controls in each instance.
- We foster an environment of regular and open communication to allow the best environment to raise concerns of slavery and human trafficking should they occur.

3. Training and Awareness

Fowlers will provide training and awareness-raising to all employees and suppliers to help prevent modern slavery and human trafficking. This training will cover how to identify signs of modern slavery and human trafficking, how to report any suspicions or concerns, and how to uphold the policy in daily business practices. We will also encourage open communication and create a safe environment for employees and suppliers to raise concerns and report any incidents of modern slavery and human trafficking. Specific training measures include:

- Modern slavery toolbox talks to ensure all know the signs to look for and how to report concerns.
- Inclusion on Fowler newsletter once a year.
- Inclusion in induction process for interns and apprentices to ensure they are not abused as a source of cheap labour.

4. Due Diligence

We will establish due diligence processes to ensure that all suppliers, contractors, and other business partners are also committed to preventing modern slavery and human trafficking. This will be achieved through:

- Incorporating Modern Slavery Act 2015 procedures into our Supply Chain Charter, to which all suppliers subscribe.
- Utilising suppliers from UK and EU only, where robust Modern Slavery laws exist.
- Incorporating Modern Slavery compliance in Supplier/Subcontractor Annual Assessments.

Fowlers is committed to working with suppliers and subcontractors to identify, address and correct modern slavery issues within their own supply chains.

5. Reporting & Investigation

Any staff member who suspects or witnesses modern slavery, or who has been the victim of modern slavery, should report it as soon as possible to their line manager or to the Managing Director, Will Lydon. Fowlers will not tolerate any form of retaliation or victimisation against staff who raise genuine concerns in good faith.

In the event that the Managing Director is implicated in the abuse or the staff member feels unable to raise their concern with the Managing Director, they should report the issue to Office Manager Mel Smith (mel.smith@fowlerbc.co.uk). All concerns will be investigated promptly and thoroughly, and appropriate remedial action will be taken in response to any findings of modern slavery.

Should they feel unable to report the matter within the organisation, they can reach out to the National Crime Agency's Modern Slavery Helpline on 08000 121 700.

6. Review

Fowlers will review this policy annually, together with any reports of concerns regarding modern slavery from the previous year, with a view to continuous improvement.

Revision History		Next Revision Due: January 2025
Date	Author	Description
04/01/2024	C Denyer	Reviewed
04/01/2023	C Denyer	Document created.