

MODERN SLAVERY (ANTI-SLAVERY AND HUMAN TRAFFICKING) POLICY

Purpose

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.

Western Blueprint Limited has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

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

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Scope/To Whom This Policy Applies

This policy applies to all persons working for Western Blueprint Limited or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and Western Blueprint Limited may amend it at any time.

Related Policies and Procedures

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the company management systems and procedures.

Employees are encouraged to familiarise themselves with these policies and to discuss any queries or concerns with line management.

Responsibility for the Policy

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Directors. Directors will ensure that this policy is implemented, monitor its use and effectiveness, deal with any queries about it, audit internal control systems and have day to day responsibility to ensure compliance with our legal and ethical obligations.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with this Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for 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 manager or a 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 are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.

If you believe or suspect that a breach of this policy has occurred, or that it may occur, you must notify your manager or a Director as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We 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.

Western Blueprint Limited is committed to ensuring that 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 of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately.

Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Western Blueprint Limited may terminate our relationship with other individuals and organisations working on our behalf, if they breach this policy.

Contractors and sub-contractors found to be in breach of this policy will be challenged and possibly removed from the contract.

Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Directors.



Richard Russell
Director



Thomas Lowe
Director

Date: 12 August 2024

Date to be reviewed: by August 2025