
Modern Slavery & Human Trafficking Policy



Pickering's®

VERSION	AUTHOR	CHANGES	APPROVER	EFFECTIVE DATE
3.0	Mark Shepstone, HR Business Partner	No changes following annual review.	Neil Moss, Managing Director 	8 th January 2025

1.0 INTRODUCTION

- 1.1 Modern slavery is a complex crime that takes a number of different forms including slavery, servitude, forced 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.
- 1.2 Pickerings Hire Limited ("the Company") have a zero-tolerance approach to modern slavery and are committed to protecting its workers and eradicating harmful and illegal practices within its business and throughout its supply chain.

2.0 SCOPE

- 2.0 This policy applies to all persons working for the Company or on its 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.
- 2.1 This policy does not form part of any employee's contract of employment and may be amended at any time.

3.0 PRINCIPLES

- 3.0 The Company will release a Modern Slavery Statement each financial year, in compliance with Section 54 of the Modern Slavery Act 2015 and this statement will be made publicly available on its website.
- 3.1 To underpin its Modern Slavery Statement, the Company will maintain robust policies and procedures with the aim of eliminating the potential for slavery, exploitation or human trafficking to occur within its business.
- 3.2 The Company's zero-tolerance approach to modern slavery will be communicated to all its suppliers along with the expectation they will also remain compliant with the Modern Slavery Act.
- 3.3 All those working for the Company or under its control must read and understand this policy and are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.4 Anyone who suspects an individual within the Company or its supply chain is displaying indicators of being trafficked or enslaved, must report this without delay.
- 3.5 Reports of any exploitative situation that may constitute a breach of this policy will be thoroughly investigated by a manager in conjunction with the HR department and appropriate action will be taken where necessary.

- 3.6 Training on this policy and the wider risk of Modern Slavery the Company's business faces from its supply chains, forms part of the induction process for all individuals who work for the Company or on its behalf.
- 3.7 The Company will ensure any legislative changes or Government led campaigns relating to Modern Slavery are communicated to its employees and embedded into its policies as appropriate.
- 3.8 Any employee who breaches this policy will face disciplinary action, which could result in their dismissal. Equally the Company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

4.0 SUPPLY CHAIN

- 4.1 Whilst the Company does not control the conduct of individuals and organisations within its supply chains, it is committed to significantly reducing the potential for exploitation and abuse associated with Modern Slavery to occur within them. Therefore, the Company has preferred suppliers who share the same standards regarding Modern Slavery.
- 4.2 The Company will conduct due diligence checks before entering into a business relationship with a supplier. This includes conveying to a potential supplier the Company's Modern Slavery Policy and seeking assurance the supplier shares the same commitment to eradicating modern slavery from within their own business and supply chain.
- 4.3 Potential suppliers who do not have their own Modern Slavery policy will be expected to declare their acceptance and ongoing adherence to the Company's Modern Slavery Policy.
- 4.3 The Company may terminate its relationship with a supplier if it is identified any process, policy or procedure within their own business or their supply chain present an increased risk of Modern Slavery occurring.

5.0 RECRUITMENT

- 5.1 The Company will conduct robust checks on any new employee including their eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- 5.2 The Company will only use specific, reputable employment agencies to source labour and will always verify the practices of any new agency comply with the Modern Slavery Act before accepting workers from that agency.

6.0 IDENTIFYING & REPORTING MODERN SLAVERY

- 6.1 Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment and are likely to be fearful of those who exploit them.
- 6.2 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

- 6.3 The following list of indicators, which is not exhaustive, could trigger suspicions that someone may be a slavery or trafficking victim:
- may not be in possession of their own passport, identification or travel document
 - will only allow others to speak for them when spoken to directly or acts if they are being coached or instructed by someone else
 - will be withdrawn or appear frightened
 - do not seem to be able to contact friends or family freely and have limited social interaction or contact with people outside their immediate environment
 - are not in control of their own earnings
 - appear to be under the impression they are bonded by debt, or in a situation of dependence
 - have been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities
- 6.4 An individual may display several of the indicators listed above but may not necessarily be a victim of slavery or trafficking. However, any suspicion slavery or trafficking has occurred, is occurring, or is at risk of taking place, should be reported in accordance with the Company's Whistle-blowing Policy.
- 6.5 Any employee who believes a particular act, ongoing behaviour or working conditions within the business renders them a victim of Modern Slavery, should raise a complaint in accordance with the Company's Grievance Policy.
- 6.6 Any reported suspicions of modern slavery will be handled in strict confidence and no-one will suffer any detrimental treatment for making such a report in good faith even if it turns out to be mistaken.