

	<b>Name</b>  <b>Modern Slavery &amp; Human Trafficking Policy Statement</b>	<b>PD014</b>	Revision No: <b>002</b>
		Pages: 2	Issued: 05.06.17

**1.1** This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out that Realtime Civil Engineering has taken steps to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain.

**1.2** Modern slavery and human trafficking remains a hidden blight on our global society. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages. Realtime Civil Engineering's Code of Conduct prohibits modern slavery.

**1.3** Realtime Civil Engineering will comply with the 10 principles of the UN Global Compact and follow the OECD Guidelines for Multinational Enterprises.

**1.4** All Realtime Civil Engineering employee's and subcontractors have a responsibility to comply with the Code of Conduct and be alert to the risks brought about by modern slavery in our business and the wider supply chain. Staff are expected to report any concerns and management are expected to act upon them.

**1.5** Suppliers (or subcontractors) are expected to act in accordance with the Code of Conduct, or an equivalent of its relevant core principles, in the performance of any agreement.

**1.6** Realtime Civil Engineering has a zero tolerance to slavery and human trafficking, and we expect all our suppliers and subcontractors to comply with and meet our values and standards. Realtime Civil Engineering will ensure compliance through management meetings, site visits, internal and external audits as necessary.

### **Policy Application**

**2.1** Realtime Civil Engineering has put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards.

**2.2** The requirements made of the supply chain in regard to modern slavery are communicated and contracted upon, through our Code of Conduct and Sustainable Procurement Policy. Realtime Civil Engineering expects all suppliers to conduct right-to-work checks of their workforce in accordance with the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their first site induction where their paper will be verified.

**2.3** Realtime Civil Engineering will seek to work in partnership with all suppliers to tackle and combat the treat of human trafficking and modern day slavery across the scaffolding industry and throughout our supply chain, in accordance with the international environmental, social and ethical standards.

**2.4** Realtime Civil Engineering operates a Code of Conduct Reporting Procedure, which provides an option for anonymity, and encourages employees', subcontractors and suppliers to report any suspected legal or ethical breaches.

**2.5** In order to ensure the highest level of understanding of the risks associated with modern slavery and human trafficking in our supply chain, Realtime Civil Engineering provides training for all staff members and site operatives.

**2.6** Realtime Civil Engineering uses Key Performance Indicators (KPIs) to measure effectiveness in ensuring that slavery and human trafficking is not taking place in any part of the business or supply chain

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### **Ethical Business**

**3.0** One of Realtime Civil Engineering's values is to Act Ethically and Transparency. At Realtime Civil Engineering, we believe our ethical values are the basis on which we can develop better solutions, projects and customer outcomes, and therefore a competitive edge. Ethical values are evident in every interaction we have with our employee's, contractors, suppliers, customers and members of the public. We expect our employee's and subcontractors to always consider whether their actions are fair and ethical. 'Doing the right thing' is embedded in our vision and values, processes and procedures and working environment. It translates into partner relationships, the way employee's and subcontractors are treated and the process used for procuring goods and services.

Our total commitment to our business is ethical.

### **Our Code of Conduct**

Our Code of Conduct defines how all Realtime Civil Engineering and contractors' work, no matter where we are in the UK. We do not tolerate any form of corruption, bribery, unfair or anti-competitive activities, discrimination or harassment.

### **Our ethical approach to all matters of business is to...**

#### **...People**

All employee's and subcontractors receive Code of Conduct training every two years, helping them make the right decisions every day Our Health and Safety programme fosters a culture of care internally, but also extending outside the company to our clients and supply chain. We want everyone to return home safely at the end of the working day. We recognise the value that a diverse workforce brings, with women making up part the Senior Management Team.

#### **...the supply chain**

Our supply chain is bound by the principles of our Code of Conduct. We pay our supply chain promptly, always meeting out payment terms. We champion a diverse supply chain and sustainable procurement policy.

#### **... Society**

As one of the leading Scaffolding contractors we are helping to drive the industry towards ever more sustainable solutions. We encourage society to be greener through our work with government, industry bodies, clients and suppliers. We are a good neighbour and strive to leave positivity legacy in the communities where we work.

For and on behalf of Realtime Civil Engineering Limited



Mr Michael Keane  
Director

Date: 5<sup>TH</sup> June 2017