

085 – MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

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85.2 DEFINITION

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

85.3 INTRODUCTION

Greenfields Countryside Ltd know that slavery, servitude, forced, bonded and compulsory labour and human trafficking “Modern Slavery” affects both adults and children across the globe and is a growing issue with globalisation and increased migration. It remains a hidden abuse and no industry sector, no matter how small or specialist is immune to Modern Slavery. Greenfields Countryside Ltd has a zero-tolerance stance to Modern Slavery and Human Trafficking within our operations and that of our third parties, including and not limited to our suppliers. We are committed to ensuring a working environment where people’s fundamental rights and freedom is respected and embraced.

85.4 OUR BUSINESS AND SUPPLY CHAIN

Our business was established in 2006, and is a highly respected company, offering a wide range of countryside management services, we provide the highest standards of work and our exceptional Health and safety is our benchmark, we pride ourselves in professionalism, always delivering an outstanding service to our clients.

Our supply chain is predominantly national; we source materials and equipment from local business.

85.5 OUR POLICIES AND CONTRACTUAL CONTROLS RELATING TO MODERN SLAVERY AND HUMAN TRAFFICKING

Greenfields Countryside Ltd have internal policies that support our modern slavery and human trafficking policy. These include; freedom and non-retaliation policy, equality and diversity policy, whistle blowing policy, forced labour policy and child labour policy.

These policies interlink and clearly state that we will not tolerate or condone any abuse of people’s human rights within any part of our business, including and limited to modern slavery and human trafficking.

Any report will be referred immediately to Human Resources, be fully investigated with appropriate corrective action taken.

This policy takes into account, and supports the policies, procedures and requirements documented in our Health & Safety Management System (HASMS) and our Integrated Management System (IMS). It is our aim to ensure that both these documents will eventually meet the requirements of ISO9001:2015 which we are currently working towards. The implementation and operation of this management system underlines our commitment to this policy statement. Additional procedures

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ensure that this policy is understood and communicated to all levels of the company and is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities. The company will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):

- Robust “right to work” checks are completed with all potential new employees
- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, polices, contracts etc.)
- Continually audit and review our practices for checking all employees are paid at least the minimum wage and have the right to work
- We encourage the reporting of concerns and the protection of whistle blowers
- The company will not knowingly support or deal with any business involved in slavery or human trafficking
- Greenfields Countryside Ltd have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values
- Our employee’s dignity, fair treatment, health, safety and well-being are of the utmost importance; during the annual review process employee’s contribution to our culture and demonstration of our values is assessed, recognised and enhancement plans determined. We act with “integrity and honour our commitments” and “we value each other
- Using our risk-based approach we will also assess the merit of writing to suppliers, requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers though a third party to obtain that third parties agreement to adhere to the code

85.6. MODERN SLAVERY AND HUMAN TRAFFICKING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we will be implementing a mandatory e learning for all employees where they will sign to say they have read, understood and will abide the Modern Slavery and Human Trafficking Policy.

In order for Greenfields Countryside Ltd to assess the effectiveness of measures taken, key performance indicators have been set and will be reported on in any future Modern Slavery and Human Trafficking Annual Statement. Greenfields Countryside Ltd have set this as a “risk” and will be reviewed 6 monthly.

85.7 KEY PERFORMANCE INDICATORS

- Employee Training complete
- Distribute and verify “Code of Conduct” to all our suppliers and sub-contractors
- Reports of Modern Slavery and Human Trafficking breaches, investigations undertaken and remedial actions taken
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This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group’s slavery and human trafficking statement.

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For transparency the company will publish the Modern Day Slavery & Trafficking Act 2017 Policy Statement on its website for the public, consumers, and employees etc. to view.

Greenfields Countryside Ltd Director: Neil Perks

Signed.....*N Perks*.....

Date: 05th October 2023

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