



ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

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.

Quinn London Ltd is a Construction main contractor committed to acting ethically and with integrity and to developing and adopting a proactive approach to tackling hidden labour exploitation in line with the requirements of the Modern Slavery Act 2015, to ensure that modern slavery or human trafficking is not taking place within our business or within our supply chain.

We are committed to:

- Ensure that all UK workers are in receipt of the minimum wage and robust immigration checks are in place.
- Ensure that labour sourcing, recruitment and worker placement processes are under control of trusted and competent staff.
- Not to use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Provide appropriate information, instruction, resources and training necessary to educate the workforce and supervisors.
- Positively encourage workers to report cases of exploitation, provide the means to do so, and protect whistle-blowers and act upon reports appropriately.
- Adopt a pro-active approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licencing Authority and Police.
- Reviewing our supply chain to identify risk areas and suitable due diligence control measures. Imported goods from outside the UK and EU are potentially more at risk of slavery and human trafficking issues, so the level of management control will be increased and monitored.
- Implement a pre-qualification process for both suppliers and sub-contractors, which includes obligations and assurances that they comply with the requirements of the Act.
- Not knowingly support or deal with any business involved in slavery or human trafficking.
- Implement this policy in line with the existing aligned policies that are contained within the Employee hand book, incorporating requirements as they are developed.

This policy applies to all persons working for us 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.

Compliance with the 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 line manager OR a Company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

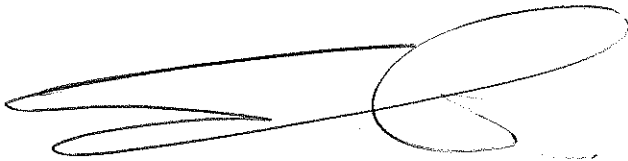
You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

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. We are committed to ensuring 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 line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

If you are found to have breached this policy, you will face disciplinary action. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Seamus Quinn

Managing Director

Date: 30 September 2022