

HUMAN RESOURCES MANUAL

Anti-Slavery and Human Trafficking Policy

Policy

Quartzelec Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

This statement relates to actions and activities during the financial year ending 30th September 2019.

Responsibility for the Policy

The Directors of the Company and Business Unit Managers of each business unit have overall responsibility for ensuring this policy complies with legal and ethical obligations and that all those under their control comply with it.

The statement will be reviewed annually in line with the financial year end and made available on the intranet and company website. This statement is endorsed by the senior management team.

Compliance with the Policy

All employees are responsible for reading, understanding and complying with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all employees working for the company and those under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Communication and Awareness of the Policy

Training on this policy and on the risk our business faces from modern slavery forms part of the induction process for all employees. Training will be provided as necessary on an ongoing basis.

Breaches of the Policy

Any employee who breaches this policy will be subject to the disciplinary procedure, which could result in dismissal for misconduct or gross misconduct. Relationships with supply chain may be terminated if their actions are deemed to breach this policy.

Anti-Slavery and Human Trafficking Statement

Quartzelec Ltd has a zero tolerance approach towards any form of slavery, servitude, forced or bonded labour, or human trafficking (collectively referred to as 'Modern Slavery' in this statement. We are committed to ensuring that there is no modern slavery in our business or in our supply chains and to act ethically and with integrity in all of our relationships.

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Our Company

Quartzelec is a leading UK independent electrical engineering group delivering design, manufacturing, installation, maintenance and service solutions to customers across a broad range of industrial and commercial sectors. The company structure, its office locations and business activity can be found on the website www.quartzelec.com.

Our Supply Chain

As part of the company's due diligence process when procuring goods or services from our supply chain, the supplier approval process and ongoing audit process will include an assessment of the controls undertaken by the supplier to ensure compliance with the Act.

Within our supply chain evaluation process we insist that all members of our supply chain declare their compliance with the Modern Slavery provisions.

In addition to producing the annual statement, the company is committed to:-


- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- Appointing a named individual to oversee the compliance with the Modern Slavery Act 2015 this person is Lindsey Moffitt, HR Director
- Identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking
- Undertaking due diligence when considering taking on new suppliers, and periodically reviews its existing suppliers by mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking, consider undertaking supplier audits and invoking sanctions against suppliers that fail to improve their performance, including the termination of the business relationship

This statement has been approved by the company's board of directors, who will review and update it annually.

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Issue Version	Issue Date	Brief Description of Change
1	14.11.2016	New Policy
2	10.11.2017	Policy reviewed
3	01.11.2018	Policy reviewed
4	01.11.2019	Policy reviewed

Approved: 

Lindsey Moffitt - HR Director