

## Anti Slavery Policy

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### Revision Table

Revised on	Version #	Description	Approved by
31/10/22	1.0	HP4-No Updates Initial Doc	Gary Anderson
07/06/23	2.0	Update Format	Ashley Barber
22/10/2024	3.0	No Update	Ashley Barber
07/10/2025	4.0	No Update / Re-issue	Ashley Barber

### Policy brief & purpose

The purpose of this policy is to ensure that Holmes Building Contractors Ltd. have appropriate systems and procedures in place to prevent modern slavery

### Scope

This policy applies to all staff employed by Holmes Building Contractors and our subcontractors and suppliers



## Policy elements

### What Is Slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed by the use of Coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation

**This policy covers all four activities.**

### How Is It Relevant to Us?

- Modern slavery is a complex and multi-faceted crime and tackling it requires many organisations and individuals to play a part. At first glance, individuals may think this subject is irrelevant to us, but it's not.
- At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.
- With this in mind, we need to pay particularly close attention to our supply chain, especially those areas which have historically proven to be at risk of the activities in Clause 1:
  - Outsourced activities such as cleaning, waste management, etc
  - Short term hire of low skilled labour
  - Sourcing of raw materials from certain locations in the world.

### Responsibilities



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- The Company, our managers and our colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.
- Everyone must observe this Policy and be aware that in this day and age 'turning a blind eye' is unacceptable and simply not an option.

## The Company

### We will:

1. Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
2. Be clear about our recruitment policy (Recruitment)
3. Examine our supply chains and be clear with key suppliers our expectations regarding the Act (see Supply chains)
4. Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
5. Ensure we have in place an open and transparent grievance process for all staff
6. Seek to raise awareness so that our colleagues know what we are doing to promote their welfare
7. Make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

## Managers

### Managers will:

1. Listen and be approachable to colleagues
2. Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
3. Remain alert to indicators of slavery (see Identifying slavery)
4. Raise the awareness and ensure all employees are provided a copy of this policy and be aware of their responsibilities
5. Use their experience and professional judgement to gauge situations

## All Employees

We all have responsibilities under this policy. Whatever your role or level within the company,

### You must:

1. Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
2. Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated



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3. Tell us if you think there is more we can do to prevent people from being exploited.

### **The Risks**

The principal areas of risk we face, related to slavery and human trafficking, include: Certain areas of the supply chain have been identified as being at a higher risk – these were identified earlier in the policy

### **Recruitment either through agencies or direct**

We manage these risk areas through our procedures set out in this policy.

Our Procedures Anti-Slavery Statement

We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously, and this is updated annually

### **Supply Chains**

We tell the companies we do business with, that we are not prepared to accept any form of exploitation. (including asking for copies of their Anti Modern Slavery Statement and Policies)

### **Recruitment**

Using Agencies

The Company follows firm policy and only uses agreed specified reputable recruitment agencies.

We expect all recruitment agencies with whom we engage: To fully comply with the Modern Anti-Slavery Act 2015;

Are free from ethical ambiguities;

Are transparent, accountable and auditable.

If the Company has reason to believe that any recruitment agency has failed to meet these standards, contracts with them would be terminated.

### **General Recruitment**

1. We always ensure all staff have a written contract of employment.

2. We always ensure staff are legally able to work in the UK.

3. We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited we will follow our reporting procedures (See Reporting slavery).



## Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
  
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion follow the reporting procedures below

## Reporting Slavery

- Talking to someone about your concerns may stop someone else from being exploited or abused.
- If you think that someone is in immediate danger, dial 999.
- Otherwise, you should discuss your concerns with the Manager who will decide a course of action which may include contacting the Police or the Gangmasters and Labour Abuse Authority  
<https://www.gla.gov.uk/>
  
- Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with a Holmes Manager before taking any further action.

## Training

All employees are made aware of this policy, and their obligation to comply with this policy.  
Monitoring Our Procedures



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Review of Anti-slavery policy annually, providing information and/or training on any changes that have been made.

A handwritten signature in blue ink, appearing to read 'Garry Holmes'.

Signed..... Garry Holmes (Director) Date 07/10/2025

A handwritten signature in blue ink, appearing to read 'Neil Holmes'.

Signed..... Neil Holmes (Director) Date 07/10/2025

A handwritten signature in black ink, appearing to read 'John Devany'.

Signed..... John Devany (Director) Date 07/10/2025

