

## **Modern Day Slavery Policy Statement**

Janson Bridging (UK) Ltd is committed to making a positive contribution to society and to the environment in which it operates by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner. In doing this, we seek to create value for all (shareholders, employees, suppliers, and sub-contractors) and for the communities in which we operate.

Janson Bridging (UK) Ltd employees are to be treated with respect, and their health, safety and basic human rights must be protected and promoted.

This procedure sets out the principles that Janson Bridging (UK) Ltd complies with. All suppliers and sub-contractors shall be made aware of this procedure and shall be expected to comply with the provisions of this or meet the same standard through their own policies.

We expect our suppliers to support this process fully and to encourage their own suppliers to work to these principles as well. To ensure adherence to and continual improvement against the policy, Janson Bridging (UK) Ltd reserves the right to visit and assess our suppliers' commitment to this procedure.

Janson Bridging (UK) Ltd will ensure that no employee or prospective employee receives less favourable treatment or is disadvantaged by any circumstances, conditions, or requirements. This policy applies to every employee, prospective employee, supplier, customer, or person connected with Janson Bridging (UK) Ltd, and to the services we provide.

Signed



18.05.23

Managing Director

Janson Bridging (UK) Ltd



***Procedure:***

The provisions of the Policy constitute minimum and not maximum standards, and the Policy should not be used to prevent others from exceeding these standards. The Policy, and any application of the provisions, must be interpreted to comply with national and other applicable law. If, the Policy exceeds the protections offered under the national or other applicable law, the provisions of the Policy shall apply.

***Employment:***

- All employees shall be free to choose their employment and shall not be forced to work against their will.
- There shall be no forced, bonded, or involuntary prison labour or human trafficking.
- Employees shall not be required to pay to work but must provide proof of eligibility to work.
- No original identity papers shall be retained by the employer.
- All employees shall be free to leave their employment after reasonable notice.

***Working conditions are safe and hygienic:***

- A safe and hygienic working environment shall be provided.
- Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring during work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Employees shall receive regular health and safety training, and such training shall be recorded and repeated for new or reassigned employees.
- Records shall be kept of accidents, injuries and known exposure to health and safety risks at work in accordance with relevant legislation.
- Access to clean toilet and sanitary facilities and to potable water shall be provided and shall be adequate for the employee numbers.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of employees.

***Wages:***

- Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standard.
- All workers shall be provided with written and understandable information about their employment conditions including wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.



***Working hours:***

- Working hours shall comply with all national laws and benchmark industry standards, whichever affords greater protection.
- Employees shall be given reasonable breaks while working and sufficient rest periods between shifts.

***No child labour:***

- No child under the age of 16 shall be employed in a role that does not comply with the relevant International Labour Organisation standards or any work that is likely to be hazardous or to interfere with the child's or young person's education or to be harmful to their health or physical, mental, spiritual, moral, or social development.

***Freedom of association and the right to collective bargaining are respected:***

- Employees, without distinction, shall have the right to join or form trade unions of their own choosing.
- No employee shall be dismissed solely because of their affiliation to a trade union.
- There shall be an open attitude towards the activities of trade unions and their organisational activities.
- Employee representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

***No discrimination is practised:***

- There shall be no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on but not limited to race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

***Regular employment is provided:***

- To every extent possible work performed must be on the basis of recognised employment relationships established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-



term contracts of employment.

***No harsh or inhumane treatment is allowed:***

- Physical, verbal, sexual or psychological abuse or harassment, the threat of physical abuse, sexual or other harassment and other forms of intimidation shall be prohibited.

***Bribery is not permitted:***

- Bribery shall not be permitted under any circumstances.
- A bribe must never be offered, promised, given, asked for or accepted.
- Bribes can include payments or anything of value, that are intended to influence someone or induce them to act improperly.
- Facilitation payments are also prohibited.
- Agents, consultants, and other service providers must also not make corrupt payments on Janson Bridging (UK) Ltd.'s behalf.
- Gifts, complimentary arrangements, hospitality, entertainment, or favours which might place you under an obligation or could reasonably be viewed as improperly influencing business transactions must not be accepted.

***Anti-money laundering:***

- Everyone is expected to comply with money laundering prevention laws.
- Payment for goods or services performed under contract in traveller's cheques, third party payments or money orders are not permitted.

***Reporting concerns:***

- Everyone is encouraged to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- Concerns should be raised directly to line managers, Human Resources, or to another senior member of management.

**Compliance:**

For employees, failure to comply with the provisions of the Policy may be subject to disciplinary action which could result in their immediate suspension or the termination of their employment.

In relation to our suppliers, we believe that transparency is vital to a successful business relationship. We are committed to building long-term relationships with suppliers and value open and honest communication with them. In the event of non-compliance, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. Janson Bridging (UK) Ltd reserves the right to terminate any agreements should a supplier decide that compliance with this Policy is impossible or where a supplier shows repeated disregard for the provisions of this procedure.