

WILLIAM BRADSHAW

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

STATEMENT

1. Modern slavery and human trafficking 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. William Bradshaw Ltd have a zero- tolerance approach to modern slavery and we are committed to acting ethically and with integrity to comply with fundamental human rights and the principals of ILO/UN guiding principles in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

STRUCTURE, BUSINESS AND SUPPLY CHAIN

2. William Bradshaw Ltd is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working within the structure for William Bradshaw Ltd and is contained within WBP 15 Org Chart & Responsibilities.

The Company business is the supply of RRV's, POS Licence and supporting services to the Rail Industry. These services are audited annually via the Railway Industry Supplier Qualification Scheme.

The supply chain is identified as per WBP ASL – Approved Supplier List.

DUE DILIGENCE

3. Employees entering the service of the Company are required to complete the Employee Application Pack WBP AP. The Modern Slavery Policy is also included in the Employee Handbook and a receipt is completed. These documents are part of the general induction process.

The supply chain is managed through the WBP ASL - Approved Supplier List. Part of this process is a requirement for all suppliers to confirm to the requirements of the Modern Slavery Act and evidence is received in the form of client supplier arrangements.

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ASSESSING AND MANAGING RISK

4. The supply chain initially must complete the WBP SCPQ Supply Chain Pre-Qualification Questionnaire and provide complete supporting evidence. Part of which includes a section on Modern Slavery requirements.

Our supply chain performance is reviewed annually and updated accordingly.

As part of our WBP UMF Unobtrusive Monitoring Form we observe on-site performance and assess any concerns regarding individuals relating to the Modern Slavery Act, this forms part of our POS Licence procedure.

PERFORMANCE

5. The performance of the Company arrangements with regards to the Modern Slavery Act will be discussed during Annual Management Review Meeting Item 1.

TRAINING AND BRIEFING

6. Employees receive the Company Modern Slavery & Human Trafficking Policy as part of their Employee Handbook. Thereafter, revisions to these documents are communicated via annual circulation of the Employee Handbook. Both staff and employees are informed of any changes to Company Procedures via our Team Briefs, confirmation of receipt is received.

Our zero-tolerance approach to modern slavery will be communicated to all our workforce, suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. Via our policy we encourage staff to raise awareness of any encountered modern slavery issues.

The Modern Slavery & Human Trafficking Policy is displayed on the Company website www.williambradshaw.co.uk

Responsibility for the Policy

William Bradshaw Ltd Directors have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it. The Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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 the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the 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 the Managing Director.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with the Managing Director. 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 part of our supply chain. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately via our Whistleblowing policy. Additionally, you can report any potential breaches of this legislation anonymously via -<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. William Bradshaw Plant Hire will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The policy will be monitored and reviewed annually during the William Bradshaw Ltd Management Review Meeting and communicated to staff annually. The policy statement is available to our supply chain on request.

Date October 2023



Managing Director

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