



HARMONIX CONSTRUCTION LTD

Modern Slavery Policy
April 2022

Date: April 2022

The UK's Metropolitan Police define modern slavery as "the illegal exploitation of people for personal or commercial gain," resulting in a wide range of abuses. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Harmonix Construction Ltd, we have an absolute zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and steps we implement to prevent slavery and human trafficking .

OUR BUSINESS AND SUPPLY CHAINS

Harmonix Construction Ltd are reputable light-industrial specialists headquartered in London, UK, with our work concentrated in the south of England.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the relevant authorities.

POLICIES

Harmonix operates the following policies for identifying and preventing slavery and human trafficking in our operations:

Whistle-Blowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential avenue of reporting to protect the identity of whistle-blowers.

Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and expect the same throughout those who work for us in our supply chain.

Procurement Policy - our procurement guidelines make explicit reference to the company's absolute zero tolerance of slavery and human trafficking.

SUPPLIER DUE DILIGENCE

Harmonix conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers and their health and safety standards, labour relations, and employee contracts
- Requiring improvements to substandard employment practices

- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

AWARENESS

Harmonix has raised awareness of modern slavery issues by putting up posters across our facilities and sending routine communication that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

TRAINING

In addition to the awareness programme, at each site Harmonix prioritises briefing workers and teams on the following:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Harmonix will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Harmonix's anti-slavery policy

MEASURING HOW WE'RE PERFORMING

Harmonix has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- Ensuring we give proper modern slavery briefings at each induction of a new site, outlining the above

- Understanding how many suppliers have an awareness programme that is similar or equivalent to ours
- Number of reports made by whistle-blowers (none at present)
- Prioritising routine communication to our staff

For any questions or concerns, please email Harmonix's Procurement and Sustainability Manager Luke White at luke@harmonixconstruction.com.

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Written in conjunction with Skillcast

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