



Modern Slavery and Human Trafficking Policy & Statement

Introduction

Manchester Electrical is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking.

Annual Statement

Although Manchester Electrical does not meet the requirements of the Modern Slavery Act 2015 that would legally require the Company to produce a slavery and human trafficking statement, we recognise the importance of preventing modern slavery and therefore we will voluntarily produce an annual slavery and human trafficking statement. A link to this statement will be on the homepage of our website and will be signed by our Managing Director.

The Managing Director is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Manchester Electrical has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

Content of the Statement

The following items will be included in the statement.

1. The structure of our organisation, the business operations of the organisation and the supply chains.
2. Our policies in relation to slavery and human trafficking.
3. The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.
4. Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking taking place, and the steps that we have taken to assess and manage the risk.
5. An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified.
6. A statement that training about slavery and human trafficking is available to all employees.

Additional Action Points

In addition to producing the annual statement, Manchester Electrical 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
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- 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
- 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.

Ethical Procurement

Statement of Intent

Ethical principles on behalf of our suppliers are one of our top priorities; in turn we demonstrate the highest level of ethical principles ourselves. We are fair in our procurement dealings and avoid any adverse conduct.

It is the responsibility of all our employees, but particularly those involved in the procurement process, to maintain and exhibit faultless standards of integrity in all business relationships, both internally and externally, and firmly to reject those practices that may reasonably be deemed improper; ensuring we are trusted and respected by all suppliers and that we are known for carrying out business efficiently in a fair and reasonable manner, and with integrity.

Aim

We are committed to ensuring the goods and services we purchase are manufactured, delivered, used and disposed of in an ethical manner.

Objectives

- To ensure that dealings with suppliers must at all times be honest, fair and even-handed, and in line with the requirements placed upon us by The Public Contracts Regulations 2015.
- Foster innovation in our supply markets to increase the availability and effectiveness of sustainable behaviour in procurement.
- To encourage and promote ethical behaviour among our suppliers and ensure this is supported by appropriate systems and procedures.
- To ensure that monitoring of staff conduct takes among suppliers and ensure that there is no suspicion of any conflict between their official duty and their private interest.

Targets

We will seek out suppliers and contractors that share our commitment to sound environmental and ethical performance and improvement. Suppliers shall comply with all national and other applicable law and regulations.

Where applicable, we will offer assistance to our suppliers in raising their ethical and fair trade awareness. We will develop partnerships with our suppliers and contractors and work together to minimise the environmental and social impacts of our supply chain.

As a result, our purchasing decisions will give preference to:

- suppliers that operate a fair employment policy
- organisations that have safe and healthy working conditions for their employees
- suppliers that contribute to, or participate in, policies that support the elimination of modern slavery in all its forms
- organisations that provide their employees with the right to a living wage and operate with an avoidance of excessive working hours and provision of regular employment
- suppliers that do not undertake any form of harsh and inhumane treatment
- suppliers who have a clear policy towards anti-bribery.

Supplier Code of Conduct

As the contracting organisation, we expect our suppliers to ensure their practices are supportive of our approach. We would like to procure goods and services that have been produced or are delivered with minimum impact on the environment and with regard for social and ethical issues such as employment conditions and welfare.

As a result, we reserve the right to refuse partnerships with organisations that do not achieve, or are unable to provide, evidence of an action plan of the following minimum standards for their operations, employees and supply chain; these are in accordance with International Labour Organisation (ILO) conventions and other public sector commitments.

Working conditions

- *Freedom of Association and Collective Bargaining (C87 and C98)* — As far as any relevant laws allow, all employees are free to form or join a union, which pertains to the protection of the terms conditions of the employment of employees, such as wages, hours of work, working conditions and grievance procedures. The working conditions have to facilitate:

- that all employees without distinction have the right to join or form trade unions of their own choosing
- employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- *Elimination of All Forms of Forced and Compulsory Labour (C29 and C105)* — Forced, bonded or compulsory labour is not used and employees are free to leave their employment after reasonable notice. Employees are not required to lodge deposits of money or identity papers with their employer.
- *Elimination of Discrimination in Respect of Employment and Occupation (C100 and C111)* — A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, weight, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.
- *Abolition of Child Labour (C138 and C182)* — Work undertaken by people of 16 years or under without consideration for their personal development, safety, education or health is prohibited. This will be supported by policies and programmes that promote the development of any employed child. We will only procure from an organisation that:
 - supports the long-term elimination of child labour (this should take place in a manner consistent with the best interests of the children concerned)
 - develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child
 - enforces the point that children and young persons under the age of 18 are not being employed at night or in hazardous conditions.

Right to a living wage

Our suppliers have to ensure that they treat their employees ethically. Wages paid for a standard working week need to meet or exceed national (or, where applicable, local) legal standards.

In addition, all workers should be provided with written information about their employment conditions in respect to wages before they enter employment.

Deductions from wages as a disciplinary measure should not be permitted.

Avoidance of excessive working hours

- Standard working hours must comply with national laws and national benchmark industry standards; whichever affords greater protection to the employee.
- All employees should not, on a regular basis, be required to work in excess of 48 hours per week and should be provided with at least one day off for every seven-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

Safe and healthy working conditions

We expect our suppliers to provide a safe and health working environment, with an awareness of any specific hazards. Our suppliers must take steps to ensure that appropriate and sufficient health and safety training is carried out and the correct practices put in place in order to minimise risk. Suitable welfare facilities should be provided to the employees; these include toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.

Environment

We would like our suppliers to have processes in place to actively improve the efficiency with which finite resources, including fossil fuels and water are used and the release of harmful emissions to the environment associated with manufacture, use and end-of-life product management are minimised. To have an effective environmental policy in place and to implement the policy at all levels throughout the company and to include a commitment to continual improvement in environmental performance, the prevention of pollution and encouraging sustainability is expected.

We also expect our suppliers to:

- comply with all environmental legislation, regulations and all local laws which relate to the organisation's environmental aspects to facilitate the protection of the environment
- have a process that ensures conformity to local regulations, including those relating to the reduction, reuse and recycling of waste and the elimination and safe disposal of dangerous materials
- identify a person within the organisation who has responsibility for environmental compliance issues and continual improvement within environmental management.

Our Working Principles

- We will ensure all procurement decisions and actions are considered and determined by a team of in-house specialists, across the organisation, to ensure the most ethical outcomes are achieved.
- Appropriate ethical, environmental and social requirements will be integrated into all procurement activities; these include pre-qualification, specification and evaluation stage.
- We will review the ethical, environmental and social impacts of a particular product or service over its whole-life cycle, and appropriate supplier performance assessment criteria and weightings will be used when doing this.
- We will also encourage and influence our suppliers to improve their ethical practice.
- We will, and we expect our suppliers to, ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this standard.
- We will consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability.

Our Accountability

- All our business premises and relevant members of staff have a shared responsibility for integrating the provisions of this policy into their ethical procurement decision-making.
- Our central procurement team has the overall accountability for developing a coordinated and integrated approach to implementing this ethical procurement policy across the whole of the organisation.
- We will review this policy and associated procedures on an annual basis and involve our suppliers in this review process.
- We will use external assessors to verify our performance against this ethical procurement policy on a regular basis.
- We will monitor and report, where appropriate, the ethical, environmental and social outcomes achieved from the application of our policy across our operations and will monitor external trends in these areas that we will need to respond to.