

Modern Slavery and Human Trafficking Policy

Business Name: ELM Surfacing Limited

Business Type: Highway Maintenance and Utilities

Address: 4 Adelaide Dock, Symmonds Drive, Sittingbourne, Kent. ME10 3SY

ELM Surfacing acknowledges the Modern Slavery Act 2015 and regards it as a matter of importance and essential part of its responsibilities. Furthermore the company is committed to continue in eliminating the modern day slavery from within its own business and that of supply chain providing products and services.

It is, therefore the Company's policy to do all that is reasonably practicable to prevent modern day slavery taking place within its own business and its supply chain.

- ELM Surfacing is a private limited company and does not operate outside United Kingdom.
- ELM Surfacing's supply chain for both products and services are based and operate in United Kingdom.
- From the date of this policy, slavery and human trafficking enquiries will be made into any new supplier engagement.
- ELM Surfacing will not engage with any business knowingly involved in slavery or human trafficking.
- ELM Surfacing will monitor that all personnel working for the company are paid appropriately and at least the minimum wage set by the UK government, and are free to leave their employment
- The Company will check that all employees are entitled to work in the UK by reviewing original passports, visa, taxation and other documentation.
- Encourage the reporting of concerns and the protection of whistle blowers.
- The Managing director and Senior Management shall take responsibility for implementing this policy.
- This Policy is delivered as a tool box talk to every employee on recruitment (induction) and is displayed on notice boards at every work location. The policy is re-issued to employees on substantial revision.
- The policy is reviewed at least annually and revised as often as may be appropriate.

This statement was approved by the Managing Director

Jeff Hollis Managing Director Date: 23rd March 2018

Version 2