



Modern slavery statement for financial year 2020/21

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Anwyl Construction Company Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Anwyl Construction Company Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Anwyl Construction Company Ltd has been established for over 85 years in the industry and now operates 3 divisions: Anwyl Homes, Anwyl Construction and Anwyl Land. Anwyl Homes has 2 regional branches: the first which operates to deliver speculative homes throughout North Wales and the North West, and Anwyl Homes Lancashire which delivers speculative homes throughout Lancashire, Merseyside, Warrington and Greater Manchester. Anwyl Construction deliver contracts for both private and public-sector clients and have experience operating in the following sectors: Education, Healthcare, Extra-Care Facilities, Social Housing and Commercial/Industrial throughout North and Mid-Wales and the North West. Anwyl Land provide services to seek, procure and develop land across the UK.

Our high-risk areas

Our risk assessments have identified that our company practices present relatively low risks in relation to modern slavery and human trafficking, however a significant risk lies within our supply chain, particularly in relation to their business practices and procedures for recruitment and bringing personnel onto our sites. In order to mitigate this risk, Anwyl operate a policy whereby all suppliers and sub-contractors must complete a pre-qualification questionnaire prior to being considered for working in partnership with Anwyl. The completed questionnaire is reviewed by both HR personnel and our health, safety and environment specialist to ensure the information provided meets the standards and requirements of our company. The questionnaire has been developed in line with ISO9001 requirements and contains questions to check a potential supplier/sub-contractors competency and practices for employment and in turn their own supply chain of due diligence for modern slavery and human trafficking prevention.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Supplier & Contractor Control Procedure. Which details the full procedure for due diligence when authorising and monitoring the supply chain and their practices.
3. Grievance/Whistleblowing Procedures. We have in place reporting procedures so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

Anwyl Construction Company Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to ensure modern slavery does not occur within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. They make sure employees' evidence of identification is presented including; passport, confirmation of address, details of the bank account where wages will be paid and a valid contract of employment
5. They make sure employees know their statutory rights including sick/holiday pay
6. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
7. They give details on how working hours are monitored
8. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We periodically conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending [date].

This statement was approved by the Board of Directors on [date]

Signed:

A handwritten signature in black ink, consisting of several fluid, overlapping strokes.

Director
Anwyl Construction Company Ltd

Date: 19/06/2020