

POLICIES

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

The company recognises the responsibility that we share with our suppliers, to buy materials and deliver our services in an ethical manner. As part of this commitment we acknowledge our responsibility towards the modern slavery act 2015 and will ensure transparency within the organization and with our suppliers of goods and services.

We want our customers to be confident that our business partners treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions or in any way forced to work under slavery. We believe that when ethical standards are in place, this can improve worker well-being, productivity and quality, which benefits both our suppliers and our customers. Only suppliers who share our standards and values will be considered appropriate to trade with our Company and we seek to develop long term trading relationships with suppliers/ businesses based on the principle of fair, open and honest dealings at all times.

As part of our company's due diligence process we audit our suppliers on a regular basis and will only work with organisations who also commit to the eradication of slavery and human trafficking. Our appraisal process will incorporate a review of the controls undertaken by our suppliers and now also requires from all suppliers an annual statement of their commitment and actions taken to eliminate modern slavery.

Imported products sourced from outside the UK or EC are potentially more at risk of modern slavery or human trafficking issues. If products have to be sourced from such locations, we look to work in partnership with companies who possess certifications which have independently assessed standards that reinforce their commitment to human rights, working conditions and the provision of a living wage.

The Company will not work with any organization that either has or is found to be knowingly involved within either human trafficking or modern slavery.

The Directors and management will be responsible for the application of this policy and ensure all activity complies with The Modern Slavery Act 2015. The Company will provide adequate resources, training and investment to ensure its successful application.

Midland Lead will train employees on this policy and our zero-tolerance approach to Modern Slavery & Human Trafficking. We will monitor the effectiveness and review this policy at appropriate intervals. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of Modern Slavery & Human Trafficking.

SIGNED:
Managing Director



DATE: December 2019

REVIEW DATE: December 2020