



## Modern Slavery and Human Trafficking Policy Statement

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### Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Beaumont Traffic Management (the Company). This statement relates to actions and activities during the financial year 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024

As part of the construction and civil engineering industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities to ensure that its supply chains are free from slavery and human trafficking.

### Organisational Structure and Supply Chain

This statement covers the activities of Beaumont Traffic Management.

The Company provides and installs Temporary Traffic Management systems to both large and small companies, local authorities and individuals who require such services.

Our supply chain ranges from large contractors to whom we provide our specialist services, providers of labour from whom we procure trained traffic management individuals, as well as other providers of goods and services.

We directly employ 35 people, but regularly utilise varying numbers subcontract labour across all of our sites when business needs require. Our supply chain is an integral part of our operations, and our success and reputation is inextricably linked to their performance and ethicality.

The Company operates solely in the United Kingdom (UK).

Our procurement activities take place in the UK and our contractors and suppliers are UK based.

The company has a set of core values and total commitments which include looking after our people, sourcing responsibly and creating value for both our customers and the communities in which we operate. Our approach is to develop long-term partnerships with suppliers whose policies, values and cultures are aligned to our own. We expect our Delivery Partners, organisations and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- **Fully comply with the Modern Slavery Act 2015;** and are •
- **Transparent, accountable and auditable;** and are
- **Free from ethical ambiguities.**

The Company has not identified any of its activities that are at high risk of slavery or human trafficking.

### Responsibility

Responsibility for the Company's anti-slavery initiatives are as follows:

- **Policies:** The HR and Internal Operations Manager is responsible for the development and the implementation of all internal HR policies and procedures. These are policies that are already in place and will be regularly reviewed and developed to fit with new and existing legislation and business needs.
- **Investigations / due diligence:** The HR and Internal Operations Manager and Office Manager will carry out all investigations required, should instances of suspected slavery and human trafficking be identified. The Company Directors will carry out any disciplinary action or take any decisions to terminate contracts with Companies found not to comply with The Act.
- **Training:** Training is provided on a yearly basis to all employees at a whole Company meeting, Modern Slavery and Human Trafficking training is also provided as part of the Company induction training for all new starters.

### **Policies and contractual controls**

We have a zero-tolerance approach towards Modern Slavery and Human Trafficking both in our own operations and our supply chain.

Our procurement policy is to source goods and services efficiently and fairly. Our procurement methods are compliant with legislation, including health and safety regulations, and conform to our ethical, environmental and responsible business standards.

Our Ethics policy states that we will not tolerate abuse of human rights in any part of our business or supply chain and will take seriously any allegation that human rights are not properly respected. Similarly, our Modern Slavery policy specifically prohibits activities linked to slavery, servitude, forced labour and human trafficking. All of our suppliers are required to comply with this policy.

Our minimum trading standards require all our suppliers to:

- Provide their employees with good working conditions and fair treatment;
- Respect workers' human rights and comply fully with all applicable laws;
- Ensure all work is voluntary, and not done under any threat of penalties or sanctions;
- Not require workers to pay any deposits for work, and employers- whether labour users or recruiters- must not keep original identity documents;
- Ensure that workers are free to leave work at any time, with all salary owed to be paid;
- Comply with the Modern Slavery Act 2015 (Transparency in Supply Chains) ('the Act'); • Implement appropriate controls to prevent Modern Slavery; and
- Notify the Company immediately if they become aware of any incident of Modern Slavery within their supply chains.

The standards also encourage our suppliers to conduct regular Modern Slavery risk assessments within their supply chains.

### **Due Diligence**

The Company will undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews will include:

- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship should it be found that any part of their product or service is delivered based on the use of slave labour.

### 2023 Activities

- Due to the success of e-learning packages to educate our employees with regards to modern slavery and human trafficking, the company will continue to use this method of refresher training for current team members
- All new employees continue to receive the full training package as part of their induction to the company.

### 2024 Activities

- Continue to carry out refresher training to all individuals within the company
- Deliver full training to new starters

### Responsibility for Compliance

The Directors of the company are responsible for their supplier relationships and for the company's compliance with the Modern Slavery Policy and the Act.

This statement is made pursuant to section 54 of the Act and was approved by the Board of Directors of Beaumont Traffic Management Ltd on the 2<sup>nd</sup> January 2024

Signed: ..... Date: 2/1/2024

Mr. N Beaumont

**Director (Operations)**

Signed: ..... Date: 2/1/2024

Mrs. D Tonks

**Director (Admin)**