

TRAD GROUP POLICY

**CORPORATE SOCIAL RESPONSIBILITY**  
(Including Code of Business Ethics and  
Slavery and Human Trafficking Statement)

04	23-Feb-18	General revision and removal of MTD name (as this company was purchased by TRAD Scaffolding Contractors)
03	26-Jul-17	General revision
02	24-Feb-17	General revision
01	01-Sep16	Inclusion of MTD Scaffolding Limited into the TRAD Group
00	01-Apr-16	First issue (amalgamation of TRAD Sister Companies' existing Policies into a Group Policy)
<b>REV</b>	<b>DATE</b>	<b>STATUS / DESCRIPTION OF CHANGES</b>

<b>DOCUMENT NO.</b>	<b>TRAD-GROUP-POL-001</b>
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**STATEMENT****Corporate Social Responsibility (CSR)**

We have brought together our existing operating principles into one *Group* framework policy under the heading of Corporate Social Responsibility (CSR). We recognise that as a modern, forward thinking business, the TRAD Group are aware of, and responsible for, the impacts upon society and the environment that arise through the provision of our undertakings. We take our corporate social responsibilities seriously as a business, contractor, employer and consumer and we are committed to understanding, managing and monitoring our environmental and social impact and we reflect these commitments in our management policies and accompanying manuals, procedures and processes.

**Note:** this Group Policy is applicable to every company within the Trad Group: Trad Scaffolding Contractors, Trad Hire & Sales Ltd, and Trad Safety Systems Ltd and all companies will ensure full compliance.<sup>1</sup>

We maintain organisational structures, management systems, manuals, procedures, processes and training plans that as a minimum ensure compliance with all relevant laws, regulations and standards. We have controls in place in our IT procedures and processes to ensure adequate levels of data protection for our clients and for our business.

The principles encompassed in this policy cover all areas of the Group's operations and have been developed to comply with legislation and best practice and will continue to be reviewed and updated to reflect our standards. The Board of Directors supports the principles set out below and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for the Group and provide practical guidance for our Directors, Managers, Supervisors and Employees.

Our Policy defines how all TRAD employees work. We are proud of the ethical business practices that we have established over the last forty years and will not tolerate any form of corruption, bribery, unfair anticompetitive activities, discrimination or harassment. Instead, we promote ethical business practices, fair treatment of all employees, including diversity and equal opportunities.

Likewise, Occupational Health and Safety is vitally important to us and our goal is to achieve zero work site injuries and we are committed to providing a safe and healthy workplace for our people and strive to keep our people, our clients' people and the general public safe from harm. Similarly, we seek protect and care for the environment, prevent pollution and strive to reduce our environmental footprint. All sections of this policy are underpinned by the ALTRAD Code of Conduct and the TRAD Group Staff Handbook and the TRAD Group's **Code of Business Ethics**, which is set out in Section 1. The other areas covered by this policy are **Occupational Health & Safety** (Section 2), **Employment** (Section 3), **Slavery and Human Trafficking Statement** (Section 4), **Customer and Community** (Section 5) and **Environment** (Section 6).

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<sup>1</sup> Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.

## **Section 1 – Code of Business Ethics (also known as Ethical Code of Conduct)**

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards and in order to further promote ethical and responsible business conduct we have assembled this **Code of Business Ethics** and related Group Policies. This code has been assembled to protect Group operations, clients, customers, stakeholders and employees and workers from the adverse effect of unethical and illegal behaviour. The Group requires all staff at all times to act with honesty, integrity and to promote ethical practices within the areas for which they are responsible. Unethical and illegal practices are an ever present threat to the Group's operations and hence must be a concern to all members of staff.

This is to be applied in all our business relationships. The code provides all employees of the Group and all third parties that represent the Group, such as consultants, representatives or third parties (collectively, "Representatives") with an important resource to guide them in making the right choices when dealing with matters relating to Business Ethics. In particular, the code addresses those areas in which we must all act in accordance with law or regulation, and also establishes the responsibilities, conditions, guiding principles and procedures to ensure employees and Representatives act appropriately on the Group's behalf. In addition to adhering to the conditions and procedures set out in the code, employees and Representatives are required to comply with the law.

**Note:** Representatives are required to comply with this Policy unless they have a suitable policy that complies with or exceeds the requirements of this Policy.

Briefly, we will:

- Conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties;
- Respect the legitimate interests of third parties with whom we have dealings in the course of our business;
- Maintain the highest standards of integrity (e.g. we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep).

This code is a declaration of the Group's intent of ensuring that Employees and Representatives act and are seen to act with the highest standards of ethical conduct and integrity in everything they do, underpinning the way we act at work, by:

- Ensuring full compliance with all legislation and driving good practice;
- Demonstrating uncompromising honesty and integrity in everything we do;
- Encouraging and ensuring open, transparent, honest and respectful communications;
- Ensuring a safe and healthy working environment free from harm for our people, our clients' people and the general public;
- Ensuring that our operations do not harm the environment and our operations provide sustainable solutions;
- Striving for best practice and innovative ideas in order to deliver the most efficient and effect solution for our clients' projects;
- Valuing, nurturing and developing our inclusive, diverse and talented workforce.

All employees and workers are responsible for their own adherence to the code, and managers are also required to consider whether the actions of their own staff and Representatives are also in accordance with the code.

All Representatives are in their own right responsible for both their and their staff's adherence to the code:

- **Compliance with the law:** We must comply in full with all relevant legislation;
- **Fraud, Theft, Bribery and Malpractice:** We must not engage in any illegal activities or engage in other fraudulent or corrupt business practices; and we must comply with the policy regarding Gifts and Hospitality (when being offered, giving or receiving hospitality and gifts).

**Note:** Please refer to the Group Staff Handbook and Group ***Fraud, Theft, Bribery and Malpractice Policy*** for further details.

- **Conflicts of Interest:** We must avoid situations where personal interests or outside activities could conflict (or potentially conflict) with those of the Group.
- **Competition:** We must not act anti-competitively;
- **Community Support and Fundraising Activities:** We must consider local communities in which we operate;
- **Political Contributions:** We must not use Group funds and resources to contribute to any political campaign, political party, political candidate or similar;
- **Whistle Blowing:** We must inform the MD or Operations Director of any concern about the conduct or any employee or anyone representing the Group (and the Group CEO will ensure that no one is penalised for whistle blowing and that the issue is fully investigated).

If you are in doubt, we strongly encourage you to ask your Line Manager for advice.

Fundamentally, the success of our approach depends upon our management, employees and workers understanding the Group's values, applying judgment and reason in an open environment and having the confidence that the Group will help and support them over difficult issues.

The Group requires employees and workers to advise their manager, who will inform the Managing Director who in turn will inform the Group CEO, when they become aware of violations of our policies. Unethical and illegal behaviour will not be tolerated and the Group will take action in all cases up to and including dismissal of employees in breach of the Code and termination of contractual relationships with Representatives.

## ***Section 2 – Occupational Health and Safety***

The health and safety of our people is of the highest priority and cannot be compromised. Our objective is to have a workplace free of incidents and injuries and our Health and Safety Policies, Manuals, Procedures and Processes are part of the drive to continually improve OH&S standards in line with HSG65). We will investigate all accidents, incidents and near misses and take actions to prevent reoccurrence and will strive for continual improvement.

**Note:** Please refer to the Group Staff Handbook and each company's ***Occupational Health and Safety Policy*** for further details.

We are committed to the continued implementation of our Behavioural Management of Safety programme, ***Play it Safe*** to ensure the Health & Safety of our people, clients' people and the general public and reiterate that OH&S will not be compromised for other objectives.

### **Section 3 – Employment**

We believe that the Group's most important asset is its people, it therefore follows that our employees are the most critical investment that we make and is equally important as commercial success.

Our treatment of our workforce will be just at all times, with no blacklists kept of potential employees or vindictive action taken against employees for accidental damage.

At all times we will seek their active engagement in our plans to make us the most professional and safest organisation possible. We endorse the United Nations Declaration on Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and have developed a number of supporting policy standards and procedures, which include non-discrimination, diversity and equal opportunities and seek to be guided by its provisions in the conduct of our business.

We will adhere to the following principles:

- We will treat all of our employees fairly and honestly and all of our staff will have agreed terms and conditions in accordance with legislation and will be given appropriate job skills training to ensure they can do the work to the best of their ability and achieve their potential.
- We will always work in compliance with legislation;
- We will pay a fair wage and we will always meet the national minimum wage;
- Working hours shall not be excessive and shall comply with industry guidelines and national standards;
- We will not employ any person below the applicable legal age;
- Take appropriate measures to ensure the health and safety of our workforce, our clients' workforce and the general public;
- Offer wages and benefits that at the very least meet relevant industry benchmarks or national legal standards;
- Where required, we will assess the risk associated with countries with countries with potential ethical issues;
- We will avoid purchasing goods from oppressive regimes and will strive to influence others from purchasing from such countries;
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and where we purchase goods or supplies we will be mindful of the possibility that others could engage in such illegal activity, and therefore we will only purchase through reputable companies.

**Note:** please see overleaf for our statement regarding prevention of Modern Slavery and Trafficking.

- We do not allow any practice that would restrict free movement of employees;
- Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management;
- Afford employees the freedom to choose to work for us. (Employees should be free to leave their employer after reasonable notice is served. Suppliers should not use forced, bonded or non-voluntary prison labour either in the UK or abroad.);
- We have disciplinary procedures for any member of staff whose conduct falls below the required standard and/or acts illegally;
- We have formal grievance procedures through which staff can raise personal and work-related issues via the TRAD Group HR Director.

**Note:** Please refer to the TRAD Group Staff Handbook and the Group **Equal Opportunities, Diversity and Equality Policy** as well as the following section for further details.

#### **Section 4 – Slavery and Human Trafficking Statement (as required by Modern Slavery Act 2015)<sup>2</sup>**

Modern slavery is a brutal form of organised crime in which people are treated as commodities and exploited for criminal and commercial gain. The International Labour Organisation (ILO) estimates that twenty one million men, women and children are working in conditions of modern slavery, including trafficked persons. The vast majority of these people are in the supply chains of legitimate industries and the UK has introduced the **Modern Slavery Act 2015** – for companies with an annual 36m turnover – to strive to prevent this horrendous behaviour in UK businesses and their supply chain.



The reason for the requirement is that while it is unlikely large companies are directly employing trafficked people, contractors and subcontractors (and/or the agencies supplying labour) there is still a risk that they could find themselves targeted by unscrupulous gangmasters who may be offering a ready supply of cheap labour.

The TRAD Group, speaking on behalf of our four companies and fully supported by our Parent Company ALTRAD, fully endorse this Statement and are fully committed to the prevention of Slavery and Trafficking. We will continue to review our policy and supply chain processes and will ensure that appropriate and coordinated action is taken throughout the TRAD Group to help eliminate the opportunity for these offences to be committed in our business and supply chain.

Additionally, as required by the **Modern Slavery Act 2015**, this statement will be continually reviewed – with additional measures put in place where required – and reissued annually.

This Statement details the resources available to prevent or identify exploitation including information about the first steps when modern slavery is identified and how and with whom to contact.

As a Group, all employees in the organisation (and the organisation's supply chain) must inform their immediate Line Manager (who will then inform the Group CEO) if they have concerns about possible modern slavery or trafficking. Alternatively, they can contact the Group HR Director Ros Howe on [RosHowe@trad.co.uk](mailto:RosHowe@trad.co.uk) or by phone on 020 8980 1155 directly who will then inform the Group CEO who will then arrange a comprehensive investigation. (Please note that all issues raised will be treated seriously and in accordance with the Code of Conduct detailed in this Policy.)

**Note:** please see the last page of this section for emergency contact details.

<sup>2</sup> Commercial Organisations with a global group turnover of £36m per annum are required by the **Modern Slavery Act 2015**, to prepare a slavery and human trafficking statement per financial year. The purpose of the statement is to set out what an organisation has done to prevent modern slavery in their business and supply chain. It is not a statement confirming there is no modern slavery anywhere in the business or supply chain.

The TRAD Group have assessed the risk and while we consider the risk low, we will strive to reduce the risk to zero by continuing to identify relevant information from internal and external sources and will continue to undertake effective risk assessments and appropriate review of those risks.

TRAD will prioritise controlling the risk of direct employment of exploited persons by the processes and checks detailed in the following section and continually review the risks and control measures required.

To further minimise the risks, the TRAD Group will strive to reduce the risk further by informing everyone of the risk of Modern Slavery and Trafficking – from the Board, through to Directors, Managers, Operatives and our supply chain where required – and to develop the skills and knowledge to understand and support risk prevention and elimination.

### **Processes and Checks<sup>3</sup>**

#### **Purchasing**

Where practicable, the companies will purchase internally through Trad Hire & Sales or through the Altrad Group. Where this is not possible, to reduce the risk TRAD will only purchase through reputable companies and will carry out audits where required depending on the severity of risk.

#### **Agency Labour**

The TRAD Group avoid using agencies where practicable, preferring to use directly employed personnel. Where agency labour is used, TRAD will carry out proper background checks, including audits where required.

**Note:** the Association of Labour Providers and the Recruitment and Employment Confederation are the two main recruitment industry associations, and working with the Gangmasters Licensing Authority to tackle modern day slavery.

#### **Contracts of employment**

The TRAD Group check that all staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

**Note:** the TRAD Group have written procedures in place to ensure that all employees have the Right to Work in the UK (and at induction ensure that the risk of modern day slavery is considered).

#### **Wages:**

The TRAD Group make sure the wages we pay go to the workers. We do not pay cash in hand or have cheque arrangements (as these forms of payment may hide the fact there is exploitation and workers may have been forced into debt and have their bank accounts controlled by exploiters). TRAD Accounts check that they do not pay money into the same bank account for different workers (which may indicate others controlling workers' wages and exploitation).

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<sup>3</sup> TRAD pass on their thanks to Balfour Beatty for their document and in particular its recommendations for suppliers, **Modern Slavery & Labour Exploitation, Guidance for Suppliers, Balfour Beatty UK.**

**Shared occupancy:**

The TRAD Group checks the names and addresses of those working for us (as a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

**Statutory rights:**

The TRAD Group makes sure our workers know their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

**Assess quotes and fees:**

The TRAD Group assesses and compares quotations and fees from agencies (and will refuse agencies offering or charging suspiciously low rates).

**Pay:**

The TRAD Group ask ALL to be vigilant and ask themselves the following questions:

- Are there a group of workers who have their wages paid into the same bank account? This may be sign of an illegal gangmaster collecting all their wages.
- Are they having wages taken off them for accommodation, food or to repay supposed debt?

**Transport:**

The TRAD Group ask ALL to be vigilant and ask themselves:

- Are a group of workers dropped off or picked up at unusual times of the day, are they all taken to the same property?

**Appearance:**

The TRAD Group ask ALL to be vigilant and ask themselves:

- Does the person look malnourished, unkempt, or appear withdrawn? Are they suffering physical injuries?
- Do they have few personal possessions and often wear the same clothes? Their normal wear may not be suitable for their work.

**Behaviour:**

The TRAD Group ask ALL to be vigilant and ask themselves:

- Is the person withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them?
- If they do speak, are they inconsistent in the information they provide, including basic facts such as the address where they live? Do they appear under the control/influence of others and rarely interact with colleagues?

**Medical care:**

The TRAD Group ask ALL to be vigilant and ask themselves:

- Does the person have old or serious untreated injuries?
- Have they delayed seeing a healthcare professional?
- Are they vague, reluctant or inconsistent in explaining how the injury occurred?

**Fear of authorities:**

The TRAD Group ask ALL to be vigilant and ask themselves:

- Is the person afraid of the authorities (police, immigration, the tax office)? Are they scared of removal or what might happen to their families?



### **Debt bondage:**

The TRAD Group ask ALL to be vigilant and ask themselves:

- Does the victim perceive themselves to be in debt to someone else or in a situation of dependence?

### **Signs to spot in potential victims:**

The TRAD Group ask Accounts, Managers, Supervisors and Employees to be vigilant and check that the person is in possession of their own legal documents (passport, identification and their own bank account details) at induction and these are not being held by someone else – if they are, this suggests exploitation.

Additionally, please check ID very carefully as victims will often be forced to use false or forged identity documents.

Do not forget to continue checking out for potential signs when visiting site and immediately take action if you feel concerned. In particular look out for signs of the following:

He/she appears to be:

- Working against their will;
- Having movements controlled;
- Subject to violence, threats;
- Distrustful of authorities;
- Unable to communicate freely with others;
- Unsure of where they are;
- Not integrated with the local community;
- Have little or no time off;
- Live in overcrowded accommodation;
- Bruises, or unexplained injuries;
- Subject to security at 'home' or work;
- No access to their earnings;
- Work excessive hours;
- In a situation of dependence.

Please see below for how to protect victims and who to contact.

### **Protection of Victims**

Please note that the Act provides a defence for slavery or trafficking victims, which is intended to encourage victims to come forward and give evidence without fear of being convicted for offences they may have committed in connection with their slavery or trafficking. It is important to note that a person is not guilty of that offence if they commit the offence because they were compelled to do so as a result of slavery or relevant exploitation (and the Act also sets up support processes for victims).

### **Further Information (and can be used for briefings)**

- ✓ Please click on the hyperlinks: [Can you spot the signs?](#)
- ✓ Stronger Together - <https://www.youtube.com/watch?v=q-5GVA5lg-Y&t=5s>

**Emergency Contact Details:**

If you are concerned that a trafficked person is in immediate danger,

- Call the 101 non-emergency number;
- Or if the person is in immediate danger or is under 18 then call 999 as a matter of urgency;
- Contact Crimestoppers anonymously on **0800 555 111**;
- Contact the Salvation Army's 24-hour confidential referral helpline on **0300 3038151**.

**TRAD Contact Details:**

If you have any concerns, please pass on the relevant information to the TRAD Group CEO via the TRAD Group HR Director Ros Howe on [RosHowe@trad.co.uk](mailto:RosHowe@trad.co.uk) or by phone on 020 8980 1155 directly who will then inform the Group CEO who will then arrange a comprehensive investigation.

### **Section 5 – Quality Management, Customer and Community Relations**

We are committed to improving the quality of our work and operations and as such are committed to the continued implementation of a Quality Management System.

We are committed to delivering high quality products and services to our customers that meet or exceed their expectations. Our customers and their satisfaction are the most vital parts of our company, and we include their perspective in every decision we make. We will investigate all complaints and take actions to prevent reoccurrence and to improve our customer relationship.

We regard suppliers as our partners and we work with them to help us achieve our policy aspirations in the delivery of our products and services, encouraging them to adopt responsible business policies and practices for mutual benefit.

We strive to be a good corporate citizen, recognising our responsibility to work in partnership with the communities in which we operate. We prefer to source suppliers from the local area (without compromising our standards) and actively try to recruit labour and apprentices from the local area (including recruiting labour from the unemployed sector).

TRAD believes that a responsible approach to developing relationships between the company and the communities we serve, nationally or local, is an essential component of delivering business success. How we interact with the business in which we operate determines our place within it and we recognise that our corporate social responsibilities to our stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and our corporate policies.

### **Section 6 – Environmental and Sustainability Policy**

Recognising that our activities may impact on the environment we have formalised an Environmental Management System and accompanying documents including Environmental Policies, Manuals, Impacts Registers and procedures as part of the drive to continually improve our environmental standards. We will only handle timber from legal and sustainable sources with a full chain of custody.

We will investigate all incidents and near misses and take action to prevent reoccurrence. In a spirit of continual improvement, we involve our workforce in the process of environmental management including subcontractors and other interested parties.

**Note:** Please refer to TRAD's **Sustainable Procurement Policy** for further details.

**Declaration**

The TRAD Group is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, Mr. Moore has been appointed with the responsibility and authority to oversee and drive compliance. The Group, the Group CEO, Managing Directors, Directors and Managers are committed to continual improvement and this Policy will be reviewed annually and the Policy will be disseminated throughout the Group and supply chain as required.

For and on behalf of the TRAD Group

**Signed:** Hard copy signed in office  
**Des Moore, TRAD Group CEO**

**Dated:** as front page

**Signed:** Hard copy signed in office  
**John Patterson, TRAD Hire & Sales, Managing Director**

**Dated:** as front page

**Signed:** Hard copy signed in office  
**Jim Gorman, TRAD Safety Systems, Managing Director**

**Dated:** as front page

**Signed:** Hard copy signed in office  
**Neil Garner, TRAD Scaffolding Contractors, Managing Director<sup>4</sup>**

**Dated:** as front page

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<sup>4</sup> Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.