

Modern Slavery & Human Trafficking Policy

1. Introduction

1.1 This policy applies to West One Contracting LLC on its own behalf and on the behalf of all its subsidiary companies within the West One Contracting LLC ('the Group'). It is committed to driving out acts of modern-day slavery and human trafficking within its business and its supply chains, including its sub-contractors and partners.

1.2 Subsidiary companies of West One Contracting LLC subject to the reporting requirements under s.54 of the UK's Modern Slavery Act 2015 are:

West One Contracting LLC

West One Project Management Services LLC.

1.3 The Group acknowledges its responsibility to the Modern Slavery Act 2015 and takes a zero tolerance approach to slavery and human trafficking. It will ensure transparency within the organisation and with suppliers of goods and services comprising its supply chain.

2. This Policy and Its Position Within the Business

2.1 The Group will not support or deal with any business knowingly involved in slavery or human trafficking.

2.2 Along with its Modern Slavery and Human Trafficking Policy, it has other corporate policies supporting its commitment to eradicating modern slavery, including:

Sustainability Policy

Code of Conduct, Disciplinary Rules and Procedures

Bribery and Corruption Policy

2.3 These demonstrate a consistent approach to its own people, the supply chain's people, their collective safety and zero tolerance to modern slavery. This policy considers, and supports, the policies, procedures and requirements documented in West One Contracting LLC Management Systems and requirements set out in the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 standards for which it is certified.

2.4 The implementation and operation of these management systems underlines commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures should they be breached. Additional procedures ensure that this policy is understood and communicated to all levels of the Group, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Group activities

3. Minimum Labour Standards Expected

3.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- Slavery, servitude (coercing someone to provide services) and forced and compulsory labour.
- Human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited).
- Committing any offence with the intention to commit human trafficking.
- Aiding, abetting, counselling, or procuring any of the above offences. All of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. The Group has a commitment to conduct its business and all its relationships based on integrity.

4. Responsibilities For Implementation

- 4.1 Anyone working on the Group's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, subcontractors, sub subcontractors, external consultants, third party representatives and suppliers must read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of the Group's businesses and supply chains is the responsibility of all those working for it or under its control. Those working on the Group's behalf are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.2 An appropriate person (such as an employee's own line manager, a Group Director or one of the organisations listed in section 5 of this policy) must be notified as soon as possible if any belief or suspicion that a breach of policy has occurred or may occur in the future. Staff are encouraged to raise concerns about modern slavery likely in any parts of the Group's supply chains in any supplier tier at the earliest possible stage.

5. Approach To Discovering Instances of Modern Slavery and Victim Support

- 5.1 Any supplier found to have knowingly breached this policy shall have their contract terminated, and all associated costs levied against them. West One Contracting LLC, and all its subsidiary companies, will not engage them again until such time as the supplier could prove they had undertaken all possible actions to remediate.
- 5.2 Any employee who breaches this policy by engaging or conspiring to engage in, modern slavery or human trafficking will face disciplinary action. This could, in the most severe circumstances, include immediate dismissal for misconduct or gross misconduct and if warranted, legal proceedings may be brought.
- 5.3 The Group may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this policy.
- 5.4 Briggs & Forrester is committed to upholding the highest standards of conduct and ethics in all areas of its business. In line with this commitment See/Hear/SpeakUp has been appointed to provide an external and independent confidential reporting service to all those working on its behalf.
- 5.5 Any suspected breaches of this policy may be reported anonymously to See/Hear/SpeakUp and senior officers in the organisation will be notified for further investigation, if appropriate.
- 5.6 Any identified victims of modern slavery or human trafficking may be referred to one of the following agencies for support:

Dubai Police-[Control Center of Human Trafficking](#) on +971 (0) 4 608 2347

Hotline for labour complaints: 8005005

Hotline for human trafficking issues: 8007283

6. Due Diligence in Relation to Implementing This Policy

- 6.1 As part of the Group's due diligence processes into slavery and human trafficking, its supplier approval process incorporates a review of the controls undertaken by the supplier.
- 6.2 Imported goods from sources outside the UAE and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.
- 6.3 West One Contracting LLC have a Group wide policy confirming zero tolerance of slavery and human trafficking and require subcontractors and suppliers to acknowledge their responsibilities in adhering to its policies.
- 6.4 West One Contracting LLC have in place and issue where appropriate, minimum procurement standards and contractual terms for subcontractors and suppliers, outlining its compliance expectations with regards to Modern Slavery and Human Trafficking as required by the UK Modern Slavery Act 2015 and UAE Federal Law No. 51 of 2006 as amended by Federal law No. 1 of 2015
- 6.5 Right to works checks are carried out on all new direct employees to ensure compliance.

7. Communication of This Policy

- 7.1 A full copy of this policy is accessible to all interested parties via the Group website.
- 7.2 All new direct employees are required to read and understand the requirements of this policy.
- 7.3 All new direct employees are required to complete the Modern Slavery and Human Trafficking training module via the learning management system.
- 7.4 Toolbox Talks are carried out on sites, covering Modern Slavery and Human Trafficking, the standards to be upheld, what to look out for and what to do if there is a belief or suspicion that modern slavery or human trafficking has occurred.

8. Review and Updating of This Policy

- 8.1 This policy will be reviewed and updated annually and amended as necessary to reflect any changes to the Group, its management systems, or relevant legislation.

- 8.2 In 2024, the Group will;

Review its procedures for collecting and holding data regarding supply chain compliance with modern slavery and use this to re-evaluate the risk within.

Review the level of training and capacity building available to staff and upon completion implement the identified training requirements.

Review its labour agency agreements to ensure they are up to date with the requirements of this policy.

Phil Hand
Group Managing Director