



DARLOW LLOYD & SONS

Part of the Darlow Lloyd Group Ltd

Darlow Lloyd & Sons Anti-Slavery Policy

Modern Anti-Slavery Statement

Modern Slavery is a crime and violation of the fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

As a company Darlow Lloyd & Sons Ltd has a zero-tolerance to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery us not taking place anywhere in our business or in any of our supply chains.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards of all our contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy.

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under control comply with it.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with the policy and given adequate and regular training on it and the issues of modern slavery supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Senior Management team.

Compliance with the policy.

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us on under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line Manager or a member of the Senior Management Team as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain of any supplier tier at the earliest stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line Manager or Company senior Management Team or report it in accordance with our Whistleblowing policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or Senior Management team.

We aim to encourage openness and will support anyone who raises genuine concern in good faith under this policy, even if it turns out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes, dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line Manager immediately. If the matter is not resolved, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in our Terms of Employment.

The Modern (Anti) Slavery policy and Statement is intended for business in all countries, especially the United Kingdom.

Communication and Awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset if our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Name: Donna Lloyd

Signature: 

Position: Company Secretary