Anti-Slavery Policy

Pave Aways Limited,
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Pave Aways Ltd. is committed to preventing modern slavery and human trafficking occurring within our organisation and to tackling the risk of occurrence in our supply chain. This policy sets out measures we will take towards this and our expectations of our staff and third parties with whom we work.

1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 This policy covers all four activities.

2 Identifying slavery

2.1 There is no typical victim, and some victims do not understand they have been exploited and are entitled to help and support.

2.2 The following key signs could indicate that someone may be a slavery or trafficking victim:

2.2.1 the person is not in possession of their own passport, identification or travel documents;

2.2.2 the person is acting as though they are being instructed or coached by someone else;

2.2.3 they allow others to speak for them when spoken to directly;

2.2.4 they are dropped off at and collected from work;

2.2.5 the person is withdrawn or they appear frightened;

2.2.6 the person does not seem to be able to contact friends or family freely; and/or

2.2.7 the person has limited social interaction or contact with people outside their immediate environment.

2.3 This list is not exhaustive.

2.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

2.5 If you have a suspicion, report it (see clause 7).

3 How is it relevant to us?

3.1 Modern slavery is a complex and sophisticated crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

3.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. More importantly, it is simply the right thing to do.

3.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

3.4 Pave Aways is committed to preventing modern slavery and ensuring all employees, subcontractors and suppliers are treated fairly and ethically. Our company promotes a culture of integrity, transparency and responsible supply chain management through due diligence, awareness and ongoing monitoring of its business operations and partners.

3.5 We need to pay close attention to the features of our organisation that are particularly vulnerable to these types of practice including:

3.5.1 our supply chain;

3.5.2 any outsourced activities, particularly those in higher risk jurisdictions or sectors;

3.5.3 cleaning and catering suppliers;

3.5.4 corporate hospitality;

3.5.5 labour agencies or sub-contractors such as demolition contractors who use labour agency staff

4 Responsibilities

4.1 Pave Aways Ltd., our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

4.2 The Heath & Safety Manager is responsible for our modern slavery risk management strategy and compliance with our legal and ethical obligations.

4.3 The Company Directors have overall accountability for our organisation's modern slavery risk management strategy.

4.4 Everyone working for us including contractors and consultants must observe this policy and be aware that turning a blind eye is unacceptable, and simply not an option. Through our strategy, vision and values we communicate our principles, which reflect our approach to modern slavery in our organisation, and in our supply chain.

4.5 Organisation responsibilities

We will:

4.5.1 regularly assess the risk of modern slavery and human trafficking occurring within our organisation and supply chain, and commit to taking steps to reduce those risks;

4.5.2 ensure we meet applicable legal obligations;

4.5.3 Pave Aways will ensure that senior leadership, contract managers, procurement teams, site managers and HR personnel responsible for implementing the company's modern slavery strategy have the appropriate knowledge, training, resources and support to effectively identify, manage and report modern slavery risks within the business and supply chain.

4.5.4 develop and communicate internally and to our suppliers and their workers, clear policies and procedures setting out our expectations, aimed at preventing slavery and human trafficking and protecting our workforce and reputation;

4.5.5 implement systems and processes to manage occupational health and safety risks within our organisation and promote the wellbeing of our staff;

4.5.6 be clear about our recruitment policy and lead by example by making appropriate checks on all employees, recruitment agencies, consultants and other relevant contractors to ensure we know who is working for us and by ensuring all those working for us are aware of this policy as part of our onboarding (see clause 5.2);

4.5.7 check our supply chains (see clause 5.1);

4.5.8 ensure we have open and transparent reporting and grievance processes for all staff and workers in our supply chains, and that there are no barriers to reporting modern slavery concerns or breaches of our policies;

4.5.9 raise awareness so that our colleagues know what we are doing to promote their welfare;

4.5.10 make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our organisation or in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (see clause 6);

4.5.11 evaluate our strategy, and measure its effectiveness including the development of our organisational values and ethical behaviours; and

4.5.12 ensure any incident of modern slavery is dealt with appropriately and relevant remedies are made available to victims.

4.6 Manager responsibilities

Managers will:

4.6.1 listen and be approachable to colleagues;

4.6.2 respond appropriately if they are told something that might indicate a colleague or any other person is being exploited;

4.6.3 remain alert to indicators of slavery (see clause 2);

4.6.4 raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and

4.6.5 use their experience and professional judgement to gauge situations.

4.7 Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

4.7.1 keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see clause 7);

4.7.2 follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated;

4.7.3 tell us if you think there is more we can do to prevent people from being exploited; and

4.7.4 familiarise yourself with the following linked policies and procedures:

(a) whistleblowing policy
(b) health and safety policy
(c) anti-bribery policy
(d)

5 Our procedures

5.1 Supply chains

5.1.1 We check and monitor our supply chains to identify, assess and manage modern slavery risks.

5.1.2 We tell the organisations we do business with that we are not prepared to accept any form of exploitation. We actively encourage responsible employment practices in our supply chain to ensure workers are provided with a safe and healthy environment, are aware of their rights, and are able to raise concerns without fear, mirroring our own culture and values.

5.1.3 We seek, where possible, to incorporate anti-slavery obligations in our supplier contracts.

5.1.4 We seek to account for each step of our supply processes—so we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

(a) supplier pre-qualification and supply chain processes;

(b) risk assessments of suppliers and subcontractors based on the nature of services, labour practices and geographic risk.

(c) ongoing monitoring, audits and performance reviews of suppliers and subcontractors where appropriate.

5.2 Recruitment

5.2.1 We are committed to ensuring that we and any external recruitment agencies we use have clear and fair recruitment policies and procedures and that no one has to pay directly or indirectly any fees to work for us.

5.2.2 As an inclusive employer we ensure that we treat all those working for us, directly or via an agency, fairly.

5.2.3 Using agencies

(a) **Our** HR Manager uses agreed, specified, reputable recruitment agencies with whom we have a written contract in place.

(b) To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

(i) conducting background checks;

(ii) investigating reputation;

(iii) ensuring the staff provided via an agency have the appropriate paperwork (eg work visas); and

(iv) ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.

(c) We keep agents on the list under regular review, at least every [*insert, eg 12*] months.

5.2.4 General recruitment

(a) We always ensure that prior to starting work, all staff have a written contract of employment describing their work, in an appropriate language, and that they have not had to pay any direct or indirect fees to obtain work.

(b) We always ensure staff are legally able to work in the UK.

(c) We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

(d) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

(e) All new recruits (included those employed via an agency) go through an onboarding programme to ensure they are aware of our strategy, vision, and values, our policies and procedures, where to find out about any updates, and of their right to join or form a trade union, including how they can do so.

5.3 If, through our recruitment process, we suspect someone is being exploited, the HR Manager will follow our reporting procedures (See clause 7).

6 Anti-slavery statement

6.1 We make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our organisation or our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our customers seriously.

6.2 This statement will be approved by the Company Directors.

6.3 We make this statement on our website and send out this policy to our employees.

7 Reporting slavery

7.1 We encourage anyone affected by modern slavery or human trafficking, or anyone with concerns that someone within our organisation, supply chain or business associates is affected by modern slavery and human trafficking to speak up. If you raise a concern under this policy in good faith, we will support you, even if you turn out to be mistaken.

7.2 Talking to someone about your concerns may stop someone from being exploited or abused.

7.3 If you think that someone is in immediate danger, dial 999.

7.4 Otherwise, employees should discuss any concerns with Jane Harvey 01691 682111 or email jane.harveyy@paveaways.co.uk or a Company Director, who will decide on the appropriate course of action and provide further guidance, or alternatively follow the company's Whistleblowing or Grievance Procedures, which are available within the company handbook.

7.5 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger you discuss your concerns first with Jane Harvey 01691 682111 or email jane.harveyy@paveaways.co.uk before taking any further action.

7.6 We have procedures in place to investigate any concerns raised and to ensure where appropriate remedial action is taken. Our procedures put victims and workers first. Where an issue concerns part of our supply chain we are committed to working with those supply chain members to facilitate improvement and education to reduce the risk of future slavery occurrences. Whilst we may consider terminating our relationship, this will not be our starting point.

8 Training

8.1 We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

8.2 We provide training for our directors on modern slavery risks and relevant issues such as human rights and occupational health and safety.

8.3 More general awareness training is provided to all staff as part of their onboarding and at regular intervals as appropriate for their role through formal training.

9 Monitoring and review

9.1 Alex Taylor, Health and Safety Manager will review and report to the directors regularly, at least annually, and at additional intervals as may be required regarding:

9.1.1 our existing and emerging legal obligations;

9.1.2 emerging modern slavery trends, risks and developments relevant to our organisation including the impact of any changes on our organisation or our approach;

9.1.3 our Anti-slavery policy and statement, along with any associated policies, processes and procedures such as risk assessments, supply chain terms and conditions including any breaches, tender documentation, supplier audit results.

9.1.4 feedback from stakeholder engagement, our audit process and our colleagues;

9.1.5 the effectiveness of our processes and procedures;

9.1.6 any recommended changes in our approach;

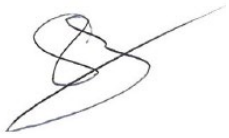
9.1.7 any suspected or identified cases of modern slavery; and

9.1.8 who it is appropriate to consult internally and externally regarding modern slavery risk.

9.2 The Company directors will approve any changes to our strategy, policy and procedures, and we will provide information and/or training on any changes we make both internally and through our supply chain, using appropriate methods and channels of communication.

9.3 We are committed to continual development and improvement of our approach. If you have any feedback regarding this policy or our approach, please provide this to Alex Taylor, Health and Safety Manager – 01691 682 111.

Signed by Steven Owen, Managing Director



Dated; 18/05/26
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