

Ethical Labour & Modern Slavery Statement

HR 040 – Rev 3.3

Introduction

Vision Architectural Glazing Installations Limited is a national construction business with operations solely based in the United Kingdom at present. Vision Arch value human rights and are committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. Vision Arch is committed to conducting its business and all its relationships based on integrity and honesty and has a zero-tolerance approach to slavery and human trafficking within its business and its supply chain.

What is Modern Slavery?

The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom (“MSA”) and applies to all Vision Arch operations and its supply chain. 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 in order to exploit them for personal or commercial gain.

Objectives

Vision Arch are committed to ensuring there is complete transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. Vision Arch expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, Vision Arch include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and Vision Arch expect that our suppliers will hold their own suppliers to the same high standards.

Responsibility for the policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, Managers, operatives, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and Vision Arch may amend it at any time.

The Human Resources department has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Operations Manager 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 this policy and are given any required training.



Compliance with the policy

Staff must ensure that they have read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify your manager OR the HR department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they must raise it with their manager or the Human Resources Department.

Vision Arch aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Vision Arch are committed to ensuring no one suffers any detrimental treatment as a result 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 part of our supply chain. If staff believe that you have suffered any such treatment, they should inform their manager immediately.

In order to meet our Anti-Slavery objectives, we will:

- Make our staff aware of the Modern Slavery Act, including its definitions of slavery and human trafficking;
- Advise staff of what to do if they suspect a case of slavery or human trafficking;
- Contact suppliers and partners in potentially higher risk categories to check what assurance arrangements they have in place;
- Commence a revision of our procurement contracts and related documents to include prohibitions in respect of slavery and human trafficking and compliance with the legislation; and
- Review our Confidentiality-Whistle Blowing Policy annually.

Due Diligence

We understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over the last decade to minimise the risk of Modern Slavery.

Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Recruitment of staff

As part of our recruitment process for employees and partners, we carry out checks prior to any person joining Vision Arch. Our HR and Recruitment teams look for potential red flags for modern slavery and follow up on any irregularities which may indicate that there is an issue. A pre-screening of individuals is carried-out, where we conduct identity checks, reference checks, right to work checks, criminal record checks, and where applicable education and professional qualification checks.

Fair pay for staff

We are committed to ensuring that all our staff and contractors are paid fairly, and we are accredited by the Living Wage Foundation as a Living Wage employer. We ensure that all our employees in the UK are paid at least the real Living Wage. We also ensure that all staff of our suppliers who provide on-site services in our UK offices are paid the real Living Wage, including those in cleaning and maintenance services, which we have identified as areas of our supply chain that are at a higher risk of modern slavery.

Communication of the Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of the Policy

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

Signed;

Eddie Wells – Managing Director



Date; 1st October 2023

Ethical Labour and Modern Slavery Action Plan 2023-24

1. Undertake full review of how Vision Arch conducts and checks on EU settlement and visa requirements and regularly review our current on-boarding processes & procedures for our employees and workers on all projects to ensure compliance.
2. Appoint a representative within the organisation who will be responsible for conducting the EU settlement and visa checks.
3. Complete a full review of the actions on how we will conduct the necessary EU settlement and visa checks for any agency workers or labour providers to ensure compliance.
4. Undertake training and TBTs to inform the workforce of the changes.
5. Ensure all employees have had their payslips reviewed in the last 18 months and confirm that any deductions are following the respective employee's employment contract and HMRC regulations.
6. Conduct an ethical labour and social audit at least once over the next 12 months.
7. Mapping of our supply chain to assess particular product or geographical risks of modern slavery and human trafficking.
8. Assessing the modern slavery and ethical labour risks of each new supplier.
9. Ensuring we have policies in place to encourage the reporting of concerns and the protection of whistle blowers.
10. Engage with our suppliers both to convey to the modern slavery and ethical labour policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
11. Continue to build long standing relationships with suppliers and making clear our expectations of business behaviour.
12. Continually look for ways to minimise modern slavery risks, demonstrate adherence to modern slavery controls and develop alignment between the different teams through sharing best practice