



## Modern Day Slavery and Human Trafficking Policy Statement

For the Financial Year of January to December 2018

February 2019

Marwood Electrical Company Limited acknowledges the contents of the Modern Slavery Act 2015 and will ensure transparency with its organisation and with suppliers of goods and services to the organisation. This statement sets the steps that Marwood has taken and will continue to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

### Our Business

Marwood Electrical Company Limited has been trading for 60 years in the Street Lighting Industry and has grown, developed and maintained a customer base that includes private and public sector customers throughout the United Kingdom. The Company has two locations, its main office with storage facilities is based in Paddock Wood in Kent, and its second location, which also includes offices and storage facility is in Cumbernauld, Scotland. The Company employs over 60 members of staff. As a Distributor of Street Lighting Marwood work closely with the main Street Lighting Manufacturers and Suppliers in the UK, to ensure that the supply chains operate in an ethical and responsible manner.

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

### Our Policies and Procedures

Marwood operate a number of internal policies to ensure that the Company is conducting its business in an ethical and transparent manner. These policies and procedures include:-

1. The Recruitment Procedure – Marwood have a recruitment procedure in place which includes conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Equal Opportunities Policy – Marwood has a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulation. These include provision of fair pay rates, fair terms and conditions of employment and access to training and development opportunities.
3. Safeguarding Policy - Marwood believes that a child, young person or vulnerable adult should never experience abuse of any kind. We acknowledge the duty of care to safeguarding and promote the welfare of children, young people and vulnerable adults.

4. Anti-Bribery Policy - All business activities are undertaken in an honest and ethical manner. Marwood take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever the Company operates.

#### Due Diligence

The Company is satisfied from its own due diligence there is no evidence of any act of modern day slavery or human trafficking within its own organisation. The Company's approach to procurement and its supply chain includes:-

- Marwood has zero tolerance towards slavery and human trafficking. Marwood expects all those in its supply chains for goods and services to comply with its policies and values.
- Ensuring that its Manufacturers and Suppliers are carefully selected through our robust supplier selection process
- Liaise with manufacturers and suppliers to ensure they are identifying and assessing potential risk areas in the supply chain
- Marwood reviews its supply chain members annually, using the standard supplier questionnaire and expects each member to confirm its adherence to the issue of modern day slavery and human trafficking.

#### Training

To ensure a high level of understanding of the risk of Modern Day Slavery and Human Trafficking in the supply chain Marwood provide training to its Procurement Team and to the Quality Manager.


Modern Day Slavery and Human Trafficking is discussed at staff induction.

#### Performance Indicators

Marwood will know the effectiveness of the steps that the Company is taking to ensure that slavery and/or human trafficking is not taking place within the business or supply chain if:

- No reports are received from the staff, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

The Company will undertake responsibility for implanting this policy statement and its objectives. The Policy Statement will be reviewed by the Board of Management and published annually.

Signature.....  ..... Date. 15.02.19..

Nick Woodcock  
Managing Director