



Modern Slavery Policy

1. INTRODUCTION

ROM Construction Limited is committed to preventing modern slavery, human trafficking, and exploitation in all its operations and supply chains. ROM Construction recognises its responsibility to act ethically and with integrity, ensuring that modern slavery does not exist within any part of its business or its suppliers' operations.

This Modern Slavery Policy outlines ROM Construction's commitment to ensuring that slavery and human trafficking are not present in its own activities or in those of its supply chain. ROM Construction fully supports the principles outlined in the **UK Modern Slavery Act 2015** and strives to ensure that all employees, contractors, suppliers, and stakeholders understand and adhere to these standards.

2. PURPOSE

The purpose of this policy is to:

- Set out ROM Construction's stance on modern slavery and human trafficking.
- Detail the measures ROM Construction will take to prevent modern slavery in its operations and supply chains.
- Ensure compliance with the UK Modern Slavery Act 2015 and other relevant legislation.
- Promote awareness of modern slavery issues within ROM Construction and its supply chain.
- Provide guidance on reporting concerns related to modern slavery or human trafficking.

3. SCOPE

This policy applies to:

- ROM Construction employees, contractors, subcontractors, and suppliers.
- All parts of ROM Construction's operations, including construction sites, offices, and supply chains.
- All individuals and entities providing goods or services to ROM Construction, either directly or indirectly.

4. DEFINITION OF MODERN SLAVERY

Modern slavery refers to situations where individuals are coerced, controlled, or deprived of their freedom to exploit them for personal or commercial gain. Modern slavery can take various forms, including:

- Forced Labour: Individuals forced to work against their will under the threat of punishment or harm.
- Human Trafficking: The recruitment, transport, or transfer of individuals for the purpose of exploitation, often involving coercion or deception.

- Debt Bondage: Workers forced to work to repay a debt, often under unfair or unreasonable terms.
- Child Labour: The exploitation of children through work that deprives them of their rights and education.
- Slavery-Like Practices: Practices that involve the control or ownership of a person, treating them as property.

5. COMMITMENT TO PREVENTING MODERN SLAVERY

ROM Construction is committed to:

- Ensuring that modern slavery and human trafficking do not exist in its operations or supply chains.
- Conducting business in a manner that respects human rights and adheres to ethical labour practices.
- Collaborating with suppliers and contractors to ensure they comply with the UK Modern Slavery Act 2015.
- Raising awareness of modern slavery within ROM Construction and its supply chain through training, education, and communication.

6. SUPPLIER CODE OF CONDUCT

6.1 Supplier Compliance

ROM Construction expects its suppliers and contractors to:

- Comply with all relevant laws, including those related to modern slavery, human trafficking, child labour, and forced labour.
- Implement effective systems and controls to ensure that modern slavery does not exist in their operations.
- Provide safe working conditions, fair wages, and respectful treatment for all workers.
- Adhere to ROM Construction's Supplier Code of Conduct, which prohibits any form of slavery, forced labour, or exploitation.

6.2 Supplier Due Diligence

ROM Construction will conduct due diligence on new and existing suppliers to assess their compliance with modern slavery legislation, including:

- Conducting risk assessments to identify potential areas of modern slavery within the supply chain.
- Requiring suppliers to provide information on their labour practices, working conditions, and supply chain operations.
- Ensuring that suppliers complete and sign a declaration confirming their adherence to ROM Construction's anti-slavery principles.
- Conducting audits and site visits, where necessary, to verify supplier compliance with ethical labour standards.

7. TRAINING AND AWARENESS

- ROM Construction will provide regular training to employees, particularly those involved in procurement, supply chain management, and human resources, to raise awareness of modern slavery risks and how to identify and report potential issues.
- ROM Construction will communicate its Modern Slavery Policy to all suppliers, contractors, and stakeholders, ensuring that they understand the importance of compliance.
- Employees are encouraged to remain vigilant for any signs of modern slavery within ROM Construction or its supply chain, including forced labour, poor working conditions, or unusual employment practices.

8. REPORTING MODERN SLAVERY CONCERNS

ROM Construction is committed to providing a safe and confidential mechanism for employees, contractors, and suppliers to report concerns related to modern slavery.

8.1 Internal Reporting

Employees are encouraged to report any concerns about modern slavery or human trafficking within ROM Construction's operations to their line manager or HR. Reports may also be made anonymously via ROM Construction's whistleblowing procedure.

8.2 Supplier Reporting

Suppliers are required to inform ROM Construction if they suspect any form of modern slavery within their operations or supply chains. Failure to report such issues may result in the termination of the supplier relationship.

8.3 Investigation and Action

All reports of modern slavery or human trafficking will be taken seriously and investigated thoroughly. ROM Construction will take prompt and appropriate action, including:

- Investigating concerns raised and working with suppliers or contractors to address and rectify any identified issues.
- Terminating contracts with suppliers or contractors found to be in breach of anti-slavery laws.
- Reporting suspected criminal activity to the relevant authorities.

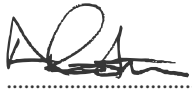
9. MONITORING AND REVIEW

ROM Construction is committed to continuously improving its efforts to prevent modern slavery. This includes:

- Regularly reviewing and updating ROM Construction’s policies and procedures to ensure they remain effective in preventing modern slavery.
- Monitoring supplier compliance through audits, reviews, and feedback mechanisms.
- Assessing the effectiveness of training programs to ensure employees are equipped to identify and respond to modern slavery risks.

This policy will be reviewed annually, or sooner if required, to reflect changes in legislation, best practices, or Company operations.

Signed:



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Andrew Rostron
Managing Director
ROM Construction Limited
Date: 14th October 2024