

## Modern Slavery Policy

### 1. Policy statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. WMQ has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships, implementing effective systems and controls to ensure modern slavery is not taking place anywhere in business or in the supply chain.

1.2 WMQ is committed to ensuring there is transparency within its business activities and consistent with disclosure obligations under the **Modern Slavery Act 2015**. We expect the same high standards from contractors, suppliers and other business partners.

1.3 This policy applies to all individuals working for WMQ in any capacity, including employees at all levels, main contractors, sub-contractors, consultants and agency staff.

### 2. Responsibility for the policy

2.1 The Directors have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all stakeholders comply with it.

2.2 The HSBQ Manager has 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.

2.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy

2.4 All WMQ employees 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 HSBQ Manager.

### 3. Compliance with the policy

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

3.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all those working for WMQ. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chain of any supplier tier at the earliest possible stage.

3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of WMQ's supply chain constitutes any of the various forms of modern slavery, raise it with your line manager, the HSBQ Manager or a Director.

3.6 WMQ aims 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. WMQ is 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 the business or in any part of the WMQ supply chain. 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 a Director. If the matter is not remedied, and you are an employee, you should raise it formally using the WMQ Grievance Procedure.

#### **4. Communication and awareness of this policy**

4.1 WMQ's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of business relationship with them and reinforced as appropriate thereafter.

#### **5. Breaches of this policy**

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 WMQ may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

**Signed:** Gordon McArthur

**Date:** Jan 2019

**Managing Director**

**Review Date:** Jan 2020