



Modern Slavery Policy

HSQC Z Drive	PO034: Modern Slavery Policy	Reviewed: 30/03/2023
	Prepared By HSQC Department	Next Review: 31/03/2024
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MODERN SLAVERY POLICY

Organisation:

This statement applies to CC Cousins Ltd (referred to in this statement as “the Organisation”). The information included in the statement refers to the 2018 financial year. It is important to note that whilst CC Cousins Ltd does not need to have this policy in place as the requirements to have one are much higher, they have made the commitment to eradicating slavery within its business.

Organisational Structure:

CC Cousins Ltd operate from one centralised office based on Medway City Estate in Rochester, UK where all employees work from. We have no other branches. The business is family owned and the board of Directors including the owners have day to day control of the organisation.

Since 1979, CC Cousins Ltd family run business has specialised in providing a comprehensive range of facilities management solutions for customer ranging from small businesses to multinational blue chip companies. No project is too large or budge too small

CC Cousins Ltd takes control of the headaches associated with running your estate. By managing all areas of your facilities we let you get on with the task of running your business efficiently. We offer a fully managed service, drawing on a wealth of experience and using the latest time and money saving techniques to provide cost effective facilities management solutions tailored to the needs of our clients, without compromising on safety or the quality of the finished job.

CC Cousins Ltd understands how wide and varied the role of site management can be. From the removal of graffiti, to the reinstatement of tarmac and the clearing of gullies, emergency roof repairs, routine landscape maintenance and blocked down pipes, we have it covered.

Our highly skilled and professional tradesmen and apprentices are supported by a dedicated fleet of vehicles and have a 24/7 response capability. Our operatives undergo extensive training on a regular basis to make sure they are up to speed with the latest industry standards and are able to manage you site to the highest possible degree.

Definitions:

The Group considers that modern slavery encompasses:

- Human trafficking
- Underage labour
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restrictions placed on freedom of movement

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Commitment:

CC Cousins Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with provisions in the Modern Slavery Act 2015. CC Cousins Ltd understands that this requires an ongoing review of both its internal practices in relation to its labour force and additionally, its supply chains.

CC Cousins Ltd does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to CC Cousins Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. CC Cousins Ltd strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply Chains:

In order to fulfil its activities, CC Cousins Ltd main supply chains include those related to facilities Solutions Management e.g. specialist services of their workforce expertise in Scaffolding, Glazing etc. from various suppliers in the United Kingdom only.

Potential Exposure:

CC Cousins Ltd do not consider themselves to be at risk of slavery and human trafficking as all its subcontractors are carefully selected and vetted.

In general, CC Cousins Ltd considers its exposure to slavery/human trafficking to be **very low**. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services for it.

Steps:

CC Cousins Ltd carried out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains such as Specialist Subcontractors who may provide services and maintenance works under their own control to our Clients.

CC Cousins Ltd has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

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In accordance with section 54(4) of the Modern Slavery Act 2015, CC Cousins Ltd has taken the following steps to ensure that modern slavery is not taking place:

- We have a zero tolerance policy towards modern slavery in the event that the supplier is, or is suspected, to be involved in modern slavery will terminate any existing contracts and remove them from our database

Key Performance Indicators:

CC Cousins Ltd has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in its organisation or its supply chains.

- Inclusion of Modern Slavery within its due diligence checking of its specialist subcontractors

Policies:

CC Cousins Ltd has the following policies which further define its stance on modern slavery with our commitment to eradicating slavery e.g. Modern Slavery Policy, Corporate Social Responsibility Policy, Supplier Code of Conduct, Recruitment Policy.

- Recruitment Policy
- Equal Opportunities Policy

Underage (Child) Labour Policy:

Our child labour policy is our position on employing minors and aims to ensure that our company and everyone we're connected with follows the law and cares for children's interests.

International, local and national child labour laws are stricter today than they were years ago. But millions of children are still forced to work in bad conditions all around the world, even in developed countries.

As an organisation, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labour is fundamental to us. We want to make sure that our organisation doesn't take part in children's exploitation and also helps end it to the best of our ability.

When it comes to young children (younger than 16), we don't want to stand in the way of their health, schooling or free time. That's why we don't and won't employ anyone younger than 16 years of age (even for the purposes of work experience) and require our clients, subcontractors and other establishments we do business with to do the same, regardless of the country they're in.

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We're also committed not to do business with any organisation that employs children younger than 16 (even for the purposes of work experience). We'll include this condition in every contract we sign and reserve the right to break the contract without penalty if a stakeholder violates this condition and refuses to agree on or follow through with this policy.

Slavery Compliance Officer:

CC Cousins Ltd has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the CC Cousins Ltd obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed each financial year.



Keith Alflatt
Joint Managing Director



Mark Alflatt
Joint Managing Director



Paul Crookes
Director



David Saunders
Director



Jack Parker
Director

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