

## MODERN SLAVERY STATEMENT

### Introduction

Pacy & Wheatley Limited has developed this statement in accordance of the Modern Slavery Act 2015, with the utmost commitment to eliminating any activities of modern day slavery and human trafficking from within its business and furthermore, filtering such actions conducted from within its supply chains, including sub-contractors, and partners.

### Policies

We are dedicated to the deterrence of modern slavery which we recognise to be forced labour, human trafficking and child slavery.

This statement is built upon numerous policies and procedure the business has in place:

- Equality and Diversity Policy
- Environmental and Sustainability Policy
- Corporate and Social Responsibility Policy

The accountability of ensuring the prevention of modern slavery and of observing/updating our compliance to this statement, alongside the adherent of the above policies, is held with our HR Director.

### About Pacy & Wheatley Limited

Pacy & Wheatley are an ever-growing and recognisable family run construction and development company with considerable experience in various sectors including healthcare/care homes, residential and educational facilities, within both new build and refurbishment projects.

At this current time, April 2018, the company employs 43 persons.

Whilst we are considered a small company this suggests, therefore, that we are not covered by specifics of the Modern Slavery Act *per se*, yet we provide works to larger companies, forming a vital part of their due diligence procedures.

### Our Understanding the Risk of Modern Slavery

The main risks of modern slavery at the forefront of Pacy & Wheatley's works are:

- The occurrence of employees not having a contract of employment; for example, a zero-hour contract.
- Under paying workers, including sub-contracting companies and the self-employed, by not meeting the expected minimum wage bracket, nor paying a competitive rate for the provided works.
- In the event of excessive working hours - all direct employees, within their initial contract, are asked to sign an opt out clause with regards to potentially having to work more than 48 hours a week at the businesses request.
- An individual not being entitled to legally seek employment in the UK.
- Less than adequate conditions for workers, including poor Health & Safety situations.
- The potential incident of bullying, discrimination and harassment.



## **Pacy & Wheatley's Due Diligence**

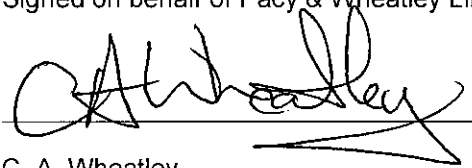
As a Company, we ensure that:

- All potential employees have the right to work in the UK.
- The minimum living wage is paid.
- Consideration is always taken when regarding the rational markets value when agreeing payments.
- Excessive working hours are kept to a minimum where possible.
- A non-tolerance strategy is in place against the prohibition of bullying, discrimination and harassment.
- The condition of all our sites are safe and secure, delivering an adequate working environment to protect a worker's health and wellbeing and quality of labour.

We often utilise the work of Sub-Contractor's. We, therefore, apply due diligence when choosing our supply chain with regards to modern slavery:

- We distribute questionnaires (i.e. PPQ's) to all our potential working relations and suppliers to allow us to approve their compliance and legal requirements concerning modern slavery.
- We assume that our clients will produce the same ethical values of us as a supplier, predominately with respect to payment terms and conditions, agreed pay rates and appropriate periods of payment applications.

Signed on behalf of Pacy & Wheatley Limited:

A handwritten signature in black ink, appearing to read 'C. A. Wheatley', is written over a horizontal line. The signature is stylized and cursive.

C. A. Wheatley  
Director

*Next Review: 18/04/2019*