



## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

The Costain Group recognises that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the "Act").

The Costain Group is fully committed to preventing unethical labour practices occurring in any part of its business or in any part of its supply chain. This Policy applies to all Costain employees as well as, suppliers and joint venture partners, who must ensure that both their businesses and supply chains worldwide comply with this Policy.

Costain Group will take steps to ensure that labour abuses including, modern slavery and human trafficking are not taking place in its own business or within any of its supply chain. This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy. Its Strategic and Preferred supplier base must be accredited to an Achilles third party scheme. Modern Slavery compliance is covered in this. All other Suppliers must have submitted a Pre-qualification document, which also covers the Act.
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006.
- Costain will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- Costain will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

Every Costain Group employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to the Costain Group Risk Management function or using the confidential telephone helpline number **0800 047 4037** provided as part of the Costain Whistleblowing Policy.

Costain Group considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Costain will notify the relevant authorities of an individual or a supplier's contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.

Signed: 

**A Wyllie CBE** (Chief Executive Officer)

Date: *15 January 2019*