

# Modern Slavery Policy



## 1. Introduction

- 1.1 The Colas Limited Modern Slavery Policy is aligned to Colas' Code of Ethics and to Colas' determination to conduct business responsibly and to the highest ethical standards.
- 1.2 Colas recognises its moral obligation to take a robust approach to prevent modern slavery, which is a crime and a gross violation of fundamental human rights. It is recognised that modern slavery 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 in order to exploit them for personal or commercial gain.
- 1.3 Colas has zero-tolerance to modern slavery and is committed, in acting ethically and with integrity in all its business dealings and relationships in accordance with Colas' Ethics Policy, to implementing and enforcing effective systems and controls to ensure modern slavery is not occurring anywhere in its business or supply chains.
- 1.4 Colas is committed to ensuring there is transparency throughout its business and in its approach to tackling modern slavery through its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. Colas expects the same high standards to be adopted by all of its contractors, suppliers and other business partners, and expects that Colas' suppliers will hold their own suppliers to the same high standards.
- 1.5 This policy applies to all persons working for Colas or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## 2. Responsibility for the Policy

- 2.1 The Directors of Colas Limited have overall responsibility for ensuring this policy complies with Colas' legal and ethical obligations, and that all those under Colas' control comply with it.
- 2.2 The Colas Limited Ethics Officer has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and organising audit of internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels of Colas are responsible for ensuring those reporting to them are aware of and understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## 3.0 Compliance with the Policy

- 3.1 Every employee must read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of Colas' business or supply chains is the responsibility of all those working for Colas or under its control. Every employee is required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Each employee must notify his/her Manager or the Company Secretary as soon as possible if he/she believes or suspects that a conflict with this policy has occurred, or may occur in the future.
- 3.4 Every employee is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Colas business or supply chains of any supplier tier, at the earliest possible stage.

3.5 If an employee believes or suspects that a breach of this policy has occurred or that it may occur, the employee must notify his/her manager or the Company Secretary.

3.6 If an employee is unsure as to whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Colas' supply chains constitutes any of the various forms of modern slavery, the employee must raise it with his/her manager or the Company Secretary.

3.7 Colas encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. In accordance with Colas' Whistleblowing Policy, Colas is committed to ensuring that 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 Colas' own business or in any of its supply chains. If an employee believes that he/she has suffered any such detrimental treatment, the Company Secretary should be informed immediately.

#### **4. Communication and Awareness of the Policy**

4.1 Colas will provide appropriate training in relation to this policy as required to individuals who work for Colas. Awareness of this policy forms part of the induction process for Colas employees.

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

#### **5. Breaches of the 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 Colas may terminate its relationship with other individuals and organisations working on Colas' behalf if they breach this policy.

Chief Executive Officer



C. Fergusson  
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