



COLORARE

COLLABORATIVE CONTRACTING

Colorare Limited

Modern Slavery and Human Trafficking Policy Statement

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15/06/2017

Statement for year 2019-2020

Colorare Limited has a zero-tolerance approach to modern slavery and human trafficking. We are fully committed to preventing the occurrence of slavery or trafficking within our business and throughout our supply chain.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Colorare Limited has taken and continues to take to ensure that modern slavery or human trafficking is not occurring within our business or our business supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Colorare Limited holds a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings. This will be done by ensuring that we put effective systems and control measures in place to safeguard against any form of modern slavery occurring within our business or its supply chain.

About Colorare Limited

Colorare Limited provides commercial and retail fit-out services specialising in painting, decorating, drylining and refurbishment.

What is slavery and human trafficking?

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 in order to exploit them for personal or commercial gain.

Our high-risk areas

- Agencies supplying staff. A request will be made to confirm that they have complied with the Act and obtained proof of eligibility to work, references, qualifications, proof of National Insurance and bank details to ensure that each worker is acting in their own right.
- Subcontract labour. Subcontractors will be asked about their understanding and compliance of the act as part of their PQQ (Pre- Qualification Questionnaire) before a contract is made.
- For suppliers of project-based materials, goods and services which/who we conduct regular business with, we require a completion of a supplier questionnaire which seeks confirmation of their understanding and compliance of the Act and that they have appropriate preventative measures in place.
- In regard to ad-hoc suppliers, we will rely on their integrity as a business as this relationship is deemed a low risk. However, should the frequency of usage and a relationship with an ad-hoc company develop, they will be required to complete a supplier questionnaire as above.

Low risk procurement areas include:

- PPE and workwear
- IT hardware, software and telecommunications
- Vehicles
- Office Furniture

- Training Services
- Travel Services

Our policies

To ensure that we are conducting our business in an ethical and transparent manner, we operate a small number of internal policies.

- On induction, staff will be made aware of the Modern Slavery Act, including its definitions of human trafficking and slavery.
- Instructed staff on the appropriate course of action should they suspect a case of slavery or trafficking.
- Reviewed our whistleblowing policy to include the matter of reporting suspected acts relating to human trafficking or modern slavery.
- Reviewed our documentation and policies to include prohibitions in respect of complying with the human trafficking and slavery regulations.

Our Suppliers

Colorare Limited operates a supplier policy and maintains a preferred supplier list. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Before adding a supplier to our preferred supplier list, all suppliers must complete a PQQ to prove their competency. This questionnaire includes the following questions in regard to adhering to the Modern Slavery Act 2015:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

Included in any contract made with a supplier or subcontractor is a clause in which we may terminate the contract at any time should any instances of modern slavery come to light.

We will also perform an online search of the company to ensure that the company in question has not been convicted of offenses relating modern slavery or human trafficking. Where applicable, an on-site audit to include a review of working conditions will be undertaken.

Responsibilities of employees

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of slavery or human trafficking is the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their Compliance Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

An employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

How can an employee raise a concern?

All employees are encouraged to raise concerns about any suspected malpractice as early as possible. If they are unsure, they should speak to the Compliance Manager who will take appropriate measures. Concerns should be reported by following the procedures laid out in our Whistleblowing policy.

Training and communication

Training on this policy is included within our induction process for all new employees and other workers.

Monitoring and Review

The Directors are ultimately responsible for the implementation and adherence to this policy and that it complies with our legal and ethical obligations.

The person with day to day responsibility for implementing this policy and for monitoring its use and effectiveness, is Compliance Manager. They are also responsible for dealing with any queries on the policy and clarifying any interpretation. Management at all levels are also responsible for ensuring that those reporting to them are made of the policy and understand it.

The Compliance Manager will monitor the effectiveness and review the implementation of this policy on a regular basis. Any improvements identified will be made as soon as possible and all workers notified of any amendments or changes.

It is the responsibility of The Directors to ensure that this policy is reviewed and updated on an annual basis, or when there is a change to the current legislation.

Signed



Steve Thorne - Managing Director

01/04/2019

Date

Date



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Communication of Policy

I understand that as Managing Director of Colorare Limited, I am responsible for the success of this policy and should ensure that I disclose any suspected danger or wrong doing.

I understand that I am invited by Colorare Limited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Compliance Manger.

I confirm that I have read the Company's Policy on Human Trafficking and Modern Slavery regarding the Modern Slavery and Human Trafficking Act 2015 and that I fully understand and agree to abide by it.

Should I suspect any misconduct in relation to the Company's Policy, I declare that I am aware of the appropriate procedures to take and the Company's Whistleblowing Policy.

Signed

Steve Thorne - Managing Director

01/04/2019

Date