

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Policy Statement

Varna Engineering Services is committed to preventing modern slavery, human trafficking, forced labour, bonded labour and all forms of exploitation within our business and supply chain.

We recognize our responsibility to uphold human rights and ethical business practices and are committed to acting with integrity, transparency and professionalism in all our business relationships.

Although Varna is not currently required to publish a Modern Slavery Statement under Section 54 of the Modern Slavery Act 2015, we voluntarily adopt this policy to demonstrate our commitment to ethical labour practices and responsible business conduct.

Scope

This policy applies to:

- Directors
- Employees
- Apprentices
- Agency workers
- Temporary workers
- Subcontractors
- Suppliers
- Consultants
- Any person acting on behalf of Varna

Our Commitment

Varna has a zero-tolerance approach to modern slavery and human trafficking.

We are committed to:

- Conducting business ethically and responsibly
- Complying with the requirements of the Modern Slavery Act 2015
- Preventing modern slavery within our operations
- Identifying and addressing risks within our supply chain
- Promoting fair employment practices

- Treating all workers with dignity and respect

Employment Practices

Varna will:

- Ensure all employees have the legal right to work in the UK
- Verify identity and right-to-work documentation before employment commences
- Pay employees in accordance with applicable employment legislation
- Ensure working hours, wages and employment conditions comply with legal requirements
- Prohibit any form of forced, compulsory or bonded labour
- Ensure employment is freely chosen and workers are free to leave their employment subject to contractual requirements
- Promote equality, diversity and inclusion throughout the workforce

Supply Chain Management

The company recognizes the risks associated with modern slavery can arise within supply chains and subcontracting arrangements.

To minimize these risks, Varna will:

- Work with reputable suppliers and subcontractors
- Assess subcontractors and suppliers before engagement
- Encourage suppliers to operate ethical employment practices
- Seek assurances that suppliers comply with relevant employment legislation
- Review concerns relating to labour standards and working conditions
- Reserve the right to terminate business relationships where modern slavery concerns are identified and not adequately addressed

Subcontractors and Agency Labour

Where subcontractors or agency workers are utilized, Varna will seek to ensure:

- Individuals are legally entitled to work in the UK
- Workers are engaged voluntarily
- Appropriate employment conditions are provided
- Workers are not subject to coercion, intimidation or exploitation
- Labour providers operate in accordance with legal and ethical standards.

Training and Awareness

Varna will:

- Promote awareness of modern slavery risks amongst management and employees
- Ensure those involved in recruitment, procurement and subcontractor management understand the indicators of modern slavery
- Encourage the reporting of any concerns relating to labour exploitation

Identifying Warning Signs

Examples of potential indicators of modern slavery may include:

- Workers appearing fearful, withdrawn or controlled
- Lack of personal identification documents
- Individuals being unable to speak independently
- Evidence of poor living or working conditions
- Workers being transported to and from work under suspicious arrangements
- Unusual wage payment arrangements
- Reports of intimidation, threats or coercion

Any concerns should be reported immediately

Reporting Concerns

Employees, subcontractors and other stakeholders are encouraged to raise concerns regarding suspected modern slavery or human trafficking.

Reports may be made to:

- Line management
- Company directors

All personnel are responsible for:

- Complying with this policy
- Remaining vigilant to indicators of modern slavery
- Reporting concerns without delay

Non-Compliance

Any employee, subcontractor or supplier found to be involved in modern slavery, human trafficking or labour exploitation may be subject to:

- Disciplinary action
- Termination of employment
- Removal from approved supplier lists
- Termination of contracts
- Referral to relevant authorities where appropriate

Monitoring and Review

Varna will review this policy annually and whenever significant changes occur within the business, legislation or supply chain arrangements.

The company is committed to continually improving its approach to preventing modern slavery and promoting ethical labour practices.

Kind Regards,

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