

## Modern Slavery and Human Trafficking Statement

This statement sets out WS Swift's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year [1 April 2019 to 31 March 2020].

WS Swift recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and or similar human rights abuses.

We are also committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

## Our Business

WS Swift is a Heating, Mechanical and Electrical Contractor and Service provider operating the United Kingdom. Our business is not carried out in any other country.

We did not consider any area of our business activities to be high risk in relation to slavery or human trafficking.

Responsibility for the organisation's anti-slavery initiatives is as follows:

## Policies

WS Swift has policies in place to reflect our commitment to acting ethically and with integrity in all our business relationships.

The below policies are in place and have been reviewed by an independent HR Consultant to ensure they are up to date with legislation and best practice and have been approved by the Directors of the company.

- Anti-bribery and Corruption Policy
- Modern Slavery Human Trafficking Policy and Statement

We also have the below policies, that are currently being reviewed by an independent HR Consultant to ensure they are up to date with legislation and best practice, and then will be approved by the Directors of the company.

- Recruitment Policy
- Dignity at Work Policy
- Whistleblowing Policy

## Investigations/due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The person responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, is Daniel Swift, Managing Director. If any reports are received, they will be thoroughly investigated and dealt with immediately.

## Training

We provide training to all members of staff and this has been incorporated into our induction programme. The organisation's modern slavery training covers:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- Protect whistle blowers.
- After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

## Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes WS Swift's slavery and human trafficking statement for the financial year ending 30<sup>th</sup> April 2020. It has been approved by the Directors, who will review and update it annually.



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**Daniel Swift [Director]**  
On behalf of WS Swift Services Ltd

Date: 1 April 2019