

## 1 PURPOSE

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that WHP Telecoms Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

WHP Telecoms Limited provide turnkey professional and infrastructure services to the UK Telecoms Market: Acquisition, Design, Structural Engineering, Planning, Construction, Rigging, Electrical, Installation & Commissioning, and Project Management. WHP employ a large internal workforce (500+) supported by a company approved external supplier base.

WHP Telecoms Ltd has 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 and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Due to the controls that WHP Telecoms operate the risk of any breach of this policy is deemed very low. Nevertheless, our approach to ensuring that there are no occurrences whatsoever is detailed below.

## 2 POLICIES

With regards to Modern Slavery, we operate a number of policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Slavery Policy. Contained within our Company handbook, this policy Statement sets out the organisation's stance on modern slavery and explains how as a company we implement the policy and manage any occurrences.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK and predominantly employing staff directly and not through third parties. Where recruitment agencies are used, they have been through our supplier approval process, and are recognised established companies with their own commitments to Modern Slavery.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about any practices within our business or supply chain, in professional confidence without fear of reprisals. Employees can raise concerns and suspicions directly with their line manager, or any line manager or Director, and if appropriate the relevant authorities will be consulted.

WHP's Company Handbook. Our handbook, and the relevant codes and policies, explain the manner in which we behave as an organisation and how we expect our employees to act

## 3 PROCEDURE

WHP Telecoms Ltd. conducts due diligence on all organisations before allowing them to become an approved supplier. Our anti-slavery policy forms part of our agreement with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- UK suppliers pay their employees at least the national minimum wage / national living wage (as appropriate)
- International suppliers pay their employees any prevailing minimum wage applicable within their country of operations
- We will terminate the agreement at any time should any instances of modern slavery become apparent.

WHP will undertake regular audits of their supplier base and proof of employee identification and trained competence will form part of this.

WHP Telecoms will not support or deal with any business knowingly involved in slavery or associated behaviour (such as human trafficking, forced labour, under payment, non-payment, threatening or coercive behaviour).

## 6 WHP STAFF

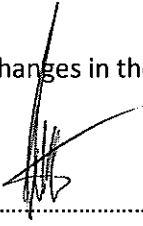
Every WHP representative is instructed to report any suspicious behaviour detailed under this policy to their line manager and / or the business support director with immediate effect. Non-adherence by any employee will result in appropriate disciplinary proceedings.

Staff will have ongoing access to this policy and any updates via WHP's sharepoint. Updates and training will be provided to staff accordingly

## 7 POLICY REVIEW

This policy is reviewed annually to address changes in the **ISMS Risk Assessment**.

Name: Rob Parry

Signed: 

Date: 1/10/2020