

MODERN SLAVERY ACT 2015 – COMPANY STATEMENT JANUARY 2019



Dawnus first published its approach to Modern Slavery in 2016 and this statement has been revised to reflect the ongoing work that is being carried out in line with our commitment to preventing slavery and human trafficking in all business activities, recruitment processes and within our supply chain. It demonstrates the measures that we have taken to ensure compliance with the Modern Slavery Act 2015 and minimise the risks of any association with practices which undermine the principles of safety and dignity in respect of our supply chain and the individuals who are current or potential workers.

As part of our initiative to identify and mitigate risk we developed a 3 year Action Plan, launched in 2016, which included actions to ensure that we introduce policies, processes and procedures to ensure that our workforce and supply chain adhere to our expectations.

The Plan included a number of actions that needed to be completed to ensure our compliance with the Modern Slavery Act 2015. Appropriate owners were assigned to each action, and deadlines set for completion. **In 2016 we completed the following actions:**

- Produced a formal policy statement outlining the company's commitment to maintain legal compliance, to be published as required by regulatory guidance, and included in the Dawnus Business Management System.
- Developed an appropriate format for a formal annual statement to be made as part of the company accounts, detailing the actions to be taken for legal compliance, and an annual review of our performance.

In 2017 we completed the following actions:

- Launched a training programme for Dawnus staff to ensure key personnel have the appropriate level of awareness to ensure compliance with the Act
- Introduced a poster campaign on all Dawnus sites to raise awareness of Modern Slavery
- Reviewed all supply chain prequalification standard template questionnaires to ensure that appropriate questions are included to enable an assessment of their controls around the area of Modern Slavery
- Reviewed HR recruitment processes to identify any potential risks associated with Dawnus recruiting direct employees

In 2018 we completed the following actions:

- Reviewed supply chain key accounts to identify high risk vendors
- Reviewed terms and conditions for all suppliers and subcontractors to include provision relating to the Modern Slavery Act and Dawnus requirements.
- Raised awareness of operatives by including Modern Slavery in inductions, Toolbox Talks, and continuing poster campaigns
- Updated staff and operatives handbook to raise awareness of modern slavery and human trafficking

Next steps:

We understand that the risk of modern slavery is not static and we will continue to improve our processes and practices to minimise risks going forward. With a particular focus on:

- Keeping our pre-qualification standards for the appointment of new suppliers and subcontractors under review
- Continuing to develop further standards to support our anti-slavery and human trafficking policy initiatives by imposing contractual terms on our supply chain asking them to confirm that their respective supply chain are in full compliance with the modern slavery requirements
- Mapping the high-risk parts of our supply chain to gain visibility of their relationship with their suppliers particularly those which source products, components or materials from high risk countries of origin

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- Continuing to train employees on identifying any potential issues within our operations and/or supply chain that could breach our anti-slavery standards

Nick Down
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February 2019