

MODERN SLAVERY ACT 2015 – COMPANY STATEMENT JANUARY 2018



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 are taking 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 have developed a 3 year Action Plan, launched in 2016, which includes actions to ensure that we introduce policies, processes and procedures to ensure that our workforce and supply chain adhere to our expectations.

The Plan includes a number of actions that must be completed to ensure our compliance with the Modern Slavery Act 2015. Appropriate owners have been 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.

We completed the following actions in 2017:

- 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

Remaining Action Plan actions, to be completed by 31st December 2018:

- Review supply chain key accounts to identify high risk vendors
- Review of terms and conditions for all suppliers and subcontractors to include provision relating to the Modern Slavery Act and Dawnus requirements.
- Raise awareness of operatives by including Modern Slavery in inductions, Toolbox Talks, and continuing poster campaigns
- Update staff and operatives handbook to raise awareness of modern slavery and human trafficking
- Carry out Employee Surveys with specific questions on modern slavery and human trafficking.

Nick Down
Group Managing Director
Dawnus Group Ltd
January 2018